

Absolutely Positively
Wellington City Council

Me Heke Ki Pōneke

Ordinary Meeting of Environment and Infrastructure Hearings Panel Agenda

9:30am Wednesday, 5 April 2023

Ngake (16.09)

Level 16, Tahiwī

113 The Terrace

Wellington



MEMBERSHIP

Councillor Abdurahman
Tim Brown (Chair)
Councillor Free
Councillor Matthews
Councillor Paul
Councillor Randle
Councillor Wi Neera

Have your say!

You can make a short presentation to the Councillors, Committee members, Subcommittee members or Community Board members at this meeting. Please let us know by noon the working day before the meeting. You can do this either by phoning 04-803-8337, emailing public.participation@wcc.govt.nz or writing to Democracy Services, Wellington City Council, PO Box 2199, Wellington, giving your name, phone number, and the issue you would like to talk about. All Council and committee meetings are livestreamed on our YouTube page. This includes any public participation at the meeting.

AREA OF FOCUS

The Environment and Infrastructure Hearings Panel has responsibility for hearing oral submissions (if required) on all consultations and engagements that will come to the Kōrau Tūāpapa | Environment and Infrastructure Committee for decision.

To read the full delegations of this committee, please visit wellington.govt.nz/meetings.

Quorum: 3 members

TABLE OF CONTENTS

5 APRIL 2023

Business	Page No.
1. Meeting Conduct	7
1.1 Karakia	7
1.2 Apologies	7
1.3 Conflict of Interest Declarations	7
1.4 Confirmation of Minutes	7
1.5 Items not on the Agenda	7
1.6 Public Participation	8
2. General Business	9
2.1 Zero Waste Strategy Hearings	9

1. Meeting Conduct

1.1 Karakia

The Chairperson will open the meeting with a karakia.

Whakataka te hau ki te uru,	Cease oh winds of the west
Whakataka te hau ki te tonga.	and of the south
Kia mākinakina ki uta,	Let the bracing breezes flow,
Kia mātaratara ki tai.	over the land and the sea.
E hī ake ana te atākura.	Let the red-tipped dawn come
He tio, he huka, he hauhū.	with a sharpened edge, a touch of frost,
Tihei Mauri Ora!	a promise of a glorious day

At the appropriate time, the following karakia will be read to close the meeting.

Unuhia, unuhia, unuhia ki te uru tapu nui	Draw on, draw on
Kia wātea, kia māmā, te ngākau, te tinana,	Draw on the supreme sacredness
te wairua	To clear, to free the heart, the body
I te ara takatū	and the spirit of mankind
Koia rā e Rongo, whakairia ake ki runga	Oh Rongo, above (symbol of peace)
Kia wātea, kia wātea	Let this all be done in unity
Āe rā, kua wātea!	

1.2 Apologies

The Chairperson invites notice from members of apologies, including apologies for lateness and early departure from the meeting, where leave of absence has not previously been granted.

1.3 Conflict of Interest Declarations

Members are reminded of the need to be vigilant to stand aside from decision making when a conflict arises between their role as a member and any private or other external interest they might have.

1.4 Confirmation of Minutes

There are no previous minutes of the Environment and Infrastructure Hearings Panel to confirm.

1.5 Items not on the Agenda

The Chairperson will give notice of items not on the agenda as follows.

Matters Requiring Urgent Attention as Determined by Resolution of the Environment and Infrastructure Hearings Panel.

The Chairperson shall state to the meeting:

1. The reason why the item is not on the agenda; and
2. The reason why discussion of the item cannot be delayed until a subsequent meeting.

The item may be allowed onto the agenda by resolution of the Environment and Infrastructure Hearings Panel.

Minor Matters relating to the General Business of the Environment and Infrastructure Hearings Panel.

The Chairperson shall state to the meeting that the item will be discussed, but no resolution, decision, or recommendation may be made in respect of the item except to refer it to a subsequent meeting of the Environment and Infrastructure Hearings Panel for further discussion.

1.6 Public Participation

A maximum of 60 minutes is set aside for public participation at the commencement of any meeting of the Council or committee that is open to the public. Under Standing Order 31.2 a written, oral or electronic application to address the meeting setting forth the subject, is required to be lodged with the Chief Executive by 12.00 noon of the working day prior to the meeting concerned, and subsequently approved by the Chairperson.

Requests for public participation can be sent by email to public.participation@wcc.govt.nz, by post to Democracy Services, Wellington City Council, PO Box 2199, Wellington, or by phone at 04 803 8334, giving the requester's name, phone number and the issue to be raised.

2. General Business

ZERO WASTE STRATEGY HEARINGS

Kōrero taunaki | Summary of considerations

Purpose

1. This report to the Environment and Infrastructure Hearings Panel (the Panel) asks that the Panel recognise the speakers who will be speaking to their submissions regarding the Zero Waste Strategy consultation.

Strategic alignment with community wellbeing outcomes and priority areas

Aligns with the following strategies and priority areas:

- Sustainable, natural eco city
- People friendly, compact, safe and accessible capital city
- Innovative, inclusive and creative city
- Dynamic and sustainable economy

- Functioning, resilient and reliable three waters infrastructure
- Affordable, resilient and safe place to live
- Safe, resilient and reliable core transport infrastructure network
- Fit-for-purpose community, creative and cultural spaces
- Accelerating zero-carbon and waste-free transition
- Strong partnerships with mana whenua

Strategic alignment with priority objective areas from Long-term Plan 2021–2031

Relevant Previous decisions

On 16 Poutū-te-rangi March 2023 the Kōrau Tūāpapa | Environment and Infrastructure Committee (the Committee) resolved to establish the Environment and Infrastructure Hearings Panel to hear oral submissions (if required) on all consultations and engagements that will come to the Committee for decision.

Financial considerations

- Nil Budgetary provision in Annual Plan / Long-term Plan Unbudgeted \$X

Risk

- Low Medium High Extreme

Author	Leteicha Lowry, Democracy Advisor
Authoriser	Siobhan Procter, Chief Infrastructure Officer

Taunakitanga | Officers' Recommendations

Officers recommend the following motion

That the Environment and Infrastructure Hearings Panel:

1. Receive the information.
2. Hear the oral submitters and thank them for their submissions.

Whakarāpopoto | Executive Summary

1. This report asks that the Panel recognise the speakers who will be speaking to their submissions regarding the Zero Waste Strategy consultation.

Takenga mai | Background

2. Te Kaunihera o Pōneke | Wellington City Council consulted on the Zero Waste Strategy from 1 Hui-tanguru February 2023 to 28 Hui-tanguru February 2023.

Kōrerorero | Discussion

3. A document comprising all of the speakers' submissions will be provided to the Panel and published on the Te Kaunihera o Pōneke | Wellington City Council [website](#).
4. The list of speakers and the page number of their submissions is provided in this report.

Ngā mahinga e whai ake nei | Next actions

5. Adoption of the Zero Waste Strategy is scheduled to go to the meeting (hui) of the Kōrau Tūāpapa | Environment and Infrastructure Committee on 27 Pāenga-whāwhā April 2023.
6. A summary of oral submissions to the Panel and the full submission document will be published alongside the agenda for the hui of the Committee.

Attachments

Attachment 1. Written Submissions of Oral Submitters [↓](#) 

Page 12

Name	Individual/Organisation	Agenda Page Number
Bernadette Casey	UsedFULLY	12
Hannah Blumhardt	The Rubbish Trip	17
Liam Prince	Kaicycle Incorporated	32
Karen Thomas	Individual	43
Brigitte Sistig	Repair Cafe Aotearoa NZ	49
Polly Griffiths	Waste Free Welly	62
Martin Payne	Friends of Owhiro Stream (FOOS)	96
Ali Forrest	Ōwhiro Bay Residents Association	101
Sue Coutts	Zero Waste Network Aotearoa	110
Spencer Clubb	Wellington City Council Environmental Reference Group	132

 **Respondent No:** 78 **Responded At:** Feb 28, 2023 14:15:44 pm


- | | |
|--|--------------|
| Q1. Are you making a submission as an individual or organisation? | Organisation |
| Q2. Name | not answered |
| Q3. Name of organisation | UsedFULLY |
| Q4. Would you like to make a public oral submission? | Yes |
| Q5. Please fill in your email address/contact details so we can contact you to organise an oral submission | [REDACTED] |
| Q6. How much do you agree or disagree with the following statement: The strategy provides clarity on council's direction for reducing waste? | Agree |
| Q7. Do you support or oppose Objective 1? Products and services provided in Wellington are waste free – we aim to avoid unnecessary resource use and to design waste out | Support |

<p>Q8. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 1.</p> <p>The suggested priority actions are: • Deliver the benefits of reuse and waste prevention through active use of Council regulations, compliance activities and enforcement • Deliver lasting behaviour change interventions by making people understand the benefits of change and then help them make that long term change easy • Work with partners and stakeholders to empower individuals to have courage to make a change in the world by inspiring individuals to reduce waste and live a more sustainable life • Work with Central Government agencies to shape policy decisions that can be developed into actions that prevent waste • Transform Wellingtonians relationship with packaging • Work with Mana Whenua, partners and stakeholders to support the redesign of systems, including changing design and production, creating new markets for reuse and recycling and inspiring Wellingtonians to cut waste, save resources and reduce Greenhouse Gas emissions • Encourage businesses, social enterprise and charities to create local and regional markets for waste materials.</p>	Undecided
<p>Q9. Do you have further comments on Objective 1 and/or related suggested priority actions?</p>	not answered
<p>Q10. Do you support or oppose Objective 2? Waste reduction is attractive and accessible to Wellingtonians – we aim to make it convenient for residents, businesses and consumers to recycle their waste.</p>	Strongly support

<p>Q11. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 2. The suggested priority actions are: • Delivery of consistent, equitable and accessible waste collections • Manage funds and revenues to support Wellington's reuse, re-purpose and recycling capacity by creating a catalyst for other investment • Deliver value for money and sustainable waste services to Wellingtonians • Innovation encouraged to support delivery of Wellington's transition to a zero-waste future • Monitoring and evaluation of waste arisings (salvage of secondary or waste products) to support effective policy making and insights • Deliver lasting behaviour change interventions by making people understand the benefits of change and then helping them make that long term change easy • Work with Central Government agencies to inform and shape system changes • Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington • Increase the amount of material that is recovered, reused and recycled to minimise waste and reduce the amount of virgin materials used in production • Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery.</p>	<p>Agree</p>
<p>Q12. Do you have further comments on Objective 2 and/or related suggested priority actions?</p>	<p>not answered</p>
<p>Q13. Do you support or oppose Objective 3? The infrastructure and systems to increase resource circularity are established – we aim to recover and process materials to regain value from resources.</p>	<p>Strongly support</p>

<p>Q14. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 3. The suggested priority actions are: • Support the provision of consistent, equitable and accessible kerbside waste collections for Wellingtonians • Work together with households, producers, collectors and reprocessors to extract the maximum value possible from food that would otherwise be wasted • Implement a kerbside organic collection and processing service to generate biofertilisers and renewable energy from organic waste • Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington • Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery • Create a waste ecosystem that demands and influences the right behaviours for desired outcomes • Support the creation of markets for secondary materials.</p>	<p>Undecided</p>
<p>Q15. Do you have further comments on Objective 3 and/or the related suggested priority options?</p>	<p>Businesses are currently omitted from this Objective but have a key role to play</p>
<p>Q16. Do you support or oppose Objective 4? Waste that cannot be avoided, reduced, reused, or recycled is managed safely – we aim to treat waste infrastructure built today as a finite resource and carefully manage it.</p>	<p>Strongly support</p>
<p>Q17. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 4. The suggested priority actions are: • Manage the treatment and disposal of sludge • Provide for and manage emergency waste • Ongoing management of the Southern landfill to support Wellington’s transition to a zero waste city • Work with partners and stakeholders to scale up interventions to recover and divert as much waste from landfill and ensure that any remaining waste is appropriately managed at Southern Landfill to protect our environment.</p>	<p>Agree</p>
<p>Q18. Do you have further comments on Objective 4 and/or the related suggested priority actions?</p>	<p>not answered</p>

Q19. Do you have any other comments to make on the overall direction of the Zero Waste Strategy?	Concerning to see the strategy based on volume to landfill as opposed to the impacts of the resources landfilled. Textiles are priority products in Europe, UK, Australia & Auckland. Prioritisation should be based on impacts & volume
Q20. Please attach any additional documents/information to support your submission.	not answered

	Respondent No: 73	Responded At: Feb 28, 2023 15:34:47 pm
	Login: [REDACTED]	Last Seen: [REDACTED]
	Email: [REDACTED]	IP Address: [REDACTED]

- Q1. Are you making a submission as an individual or organisation? Organisation

- Q2. Name not answered

- Q3. Name of organisation The Rubbish Trip

- Q4. Would you like to make a public oral submission? Yes

- Q5. Please fill in your email address/contact details so we can contact you to organise an oral submission [REDACTED]

- Q6. How much do you agree or disagree with the following statement: The strategy provides clarity on council's direction for reducing waste? Agree

- Q7. Do you support or oppose Objective 1? Products and services provided in Wellington are waste free – we aim to avoid unnecessary resource use and to design waste out Strongly support

<p>Q8. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 1.</p> <p>The suggested priority actions are: • Deliver the benefits of reuse and waste prevention through active use of Council regulations, compliance activities and enforcement • Deliver lasting behaviour change interventions by making people understand the benefits of change and then help them make that long term change easy • Work with partners and stakeholders to empower individuals to have courage to make a change in the world by inspiring individuals to reduce waste and live a more sustainable life • Work with Central Government agencies to shape policy decisions that can be developed into actions that prevent waste • Transform Wellingtonians relationship with packaging • Work with Mana Whenua, partners and stakeholders to support the redesign of systems, including changing design and production, creating new markets for reuse and recycling and inspiring Wellingtonians to cut waste, save resources and reduce Greenhouse Gas emissions • Encourage businesses, social enterprise and charities to create local and regional markets for waste materials.</p>	<p>Undecided</p>
<p>Q9. Do you have further comments on Objective 1 and/or related suggested priority actions?</p>	<p>Yes, see our answer to this question in attached supporting document.</p>
<p>Q10. Do you support or oppose Objective 2? Waste reduction is attractive and accessible to Wellingtonians – we aim to make it convenient for residents, businesses and consumers to recycle their waste.</p>	<p>Support</p>

<p>Q11. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 2. The suggested priority actions are:</p> <ul style="list-style-type: none"> • Delivery of consistent, equitable and accessible waste collections • Manage funds and revenues to support Wellington’s reuse, re-purpose and recycling capacity by creating a catalyst for other investment • Deliver value for money and sustainable waste services to Wellingtonians • Innovation encouraged to support delivery of Wellington’s transition to a zero-waste future • Monitoring and evaluation of waste arisings (salvage of secondary or waste products) to support effective policy making and insights • Deliver lasting behaviour change interventions by making people understand the benefits of change and then helping them make that long term change easy • Work with Central Government agencies to inform and shape system changes • Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington • Increase the amount of material that is recovered, reused and recycled to minimise waste and reduce the amount of virgin materials used in production • Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery. 	<p>Agree</p>
<p>Q12. Do you have further comments on Objective 2 and/or related suggested priority actions?</p>	<p>Yes, see our answer to this question in the attached supporting document.</p>
<p>Q13. Do you support or oppose Objective 3? The infrastructure and systems to increase resource circularity are established – we aim to recover and process materials to regain value from resources.</p>	<p>Support</p>

<p>Q14. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 3. The suggested priority actions are: • Support the provision of consistent, equitable and accessible kerbside waste collections for Wellingtonians • Work together with households, producers, collectors and reprocessors to extract the maximum value possible from food that would otherwise be wasted • Implement a kerbside organic collection and processing service to generate biofertilisers and renewable energy from organic waste • Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington • Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery • Create a waste ecosystem that demands and influences the right behaviours for desired outcomes • Support the creation of markets for secondary materials.</p>	<p>Undecided</p>
<p>Q15. Do you have further comments on Objective 3 and/or the related suggested priority options?</p>	<p>Yes, we have provided an answer to this question in the attached supporting document.</p>
<p>Q16. Do you support or oppose Objective 4? Waste that cannot be avoided, reduced, reused, or recycled is managed safely – we aim to treat waste infrastructure built today as a finite resource and carefully manage it.</p>	<p>Strongly support</p>
<p>Q17. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 4. The suggested priority actions are: • Manage the treatment and disposal of sludge • Provide for and manage emergency waste • Ongoing management of the Southern landfill to support Wellington's transition to a zero waste city • Work with partners and stakeholders to scale up interventions to recover and divert as much waste from landfill and ensure that any remaining waste is appropriately managed at Southern Landfill to protect our environment.</p>	<p>Agree</p>

Q18. Do you have further comments on Objective 4 and/or the related suggested priority actions?

We fully support the answer set out in the Waste Free Welly template submission in relation to this question:
https://docs.google.com/document/d/1IFE-M9omhfQMjJ8l3kU7EMXi_WjcTg6SoJuyQqQcK1Y

Q19. Do you have any other comments to make on the overall direction of the Zero Waste Strategy?

Yes, we have answered this question in the attached supporting document.

Q20. Please attach any additional documents/information to support your submission.

[REDACTED]



Supplementary document of answers to the free text questions in the Wellington City Council consultation form on *He anamata para kore mō Pōneke – A zero waste future for Wellington*

Submitted 28 February 2023

8 Do you have further comments on Objective 1 and/or related suggested priority actions?

The Rubbish Trip strongly supports this objective and we applaud the council for including it. We would like to see the words and meaning of the objective carry through into the commentary that follows the objective, to give assurance that the priority actions will deliver on Objective 1. This is why we have selected “undecided” for question 7 – the priority actions are perfectly legitimate actions that could deliver on the objective, if the meaning/purpose of the objective is understood. Our concern is that the commentary that follows the objective on pages 56-59 isn’t really about waste prevention and waste-free products and services, which has left us unsure about what the Council plans to deliver with the priority actions.

We strongly support Objective 1 because it upholds the top of the waste hierarchy by focusing on waste prevention, and it does so by recognising the need to go upstream and support waste-free products and services, rather than focusing on the least bad ways to ‘get rid of waste’ once it is already produced. The latter might save things from going to landfill, but it doesn’t avoid unnecessary resource use, which is also very rightly part of Objective 1.

The core goal of zero waste and the circular economy is to drive down resource use and raw material extraction because this is the most effective way to reduce waste, and also brings greater greenhouse gas abatement potential than activities further down the waste hierarchy. A recent report by Eunomia UK has found that extracting resources and turning them into raw materials accounts for 25% of global greenhouse gas emissions, 78% of which is caused just by aluminium, iron and steel, concrete and cement, and plastics. Staying within the carbon budget left to limit global warming to 1.5°C will require consumption reduction for all these materials, with “drastic” reductions required for plastic, in particular (e.g. a complete reversal of its current

growth trajectory, and 75% real reduction in per capita consumption by 2050).¹ This is why this objective to support waste-free products and services is so important. It also shows how it ties in with Council's wider climate and emissions reduction strategies. We think the connection between this objective and emissions reduction could be made more clearly in the strategy.

While the headline objective is clear and reflective of the top of the waste hierarchy, the commentary that follows, on pages 56-59 reads as though it has been written for a different objective. For example, the focus and examples switch to waste diversion (i.e. what to do with waste once it has already been produced). We fully support the Waste Free Welly template submission² that this section "should be rewritten to focus on **waste prevention, reduction and reuse practices**, to match up with the objective. These practices are about moving away from single-use, disposable and short-life products, towards sharing/library business models, durable products, and reuse systems."

Council can position itself as a leader in ushering in new waste-free products and services by actively procuring them and phasing-out wasteful products and services. For example, all council venues, events and facilities, and the buildings that host them, should be free of single-use products, bottled water, and be procuring everyday products like milk, coffee, tea from local suppliers in reusable packaging. As this is not currently the case, achieving this should be a priority **target** in the strategy, with a **near-term timeframe** for achievement. These are very basic steps that are already possible in Wellington and which many residents are already undertaking. The Rubbish Trip produces regional zero waste guides for the whole of New Zealand - the Wellington guide is bursting at the seams with local suppliers and businesses who sell everyday essentials unpackaged or through reusable packaging systems. There are public institutions in the city that are already further ahead than Council in some areas, such as Te Herenga Waka – Victoria University of Wellington's steps to phase out the use of disposable coffee cups from campus cafes (which avoided the creation of 200,000 disposable coffee cups in just 2022), and to procure milk in reusable glass bottles for staff kitchenettes. At the very least, Council needs to catch-up with the most progressive residents and institutions in Wellington, in order to lead on zero waste in the City.

We also encourage Council to continue to adopt bylaws, invest in relevant infrastructure and systems, and broker access to inner city and suburban spaces, to help the city's businesses and communities to normalise and implement reduce and reuse systems and services, such as reusable packaging systems and product/service sharing systems, e.g. Mevo, laundromats, and libraries. The provision of Council parking spaces to Mevo is one example the Council could have shared in this commentary to show how Council is already working to support the growth of new business models in the city. Furthermore, all events in the city should be required to be fully reusable by 2030 at the latest – it's ridiculous that in 2023 *any* event, but especially outdoor events, and *especially* outdoor events on waterfronts and coastlines (including a weekly market) are still permitted to use disposable serviceware, with all the documented information that exists (some of which is cited in the Strategy itself) about the waste these products cause that either go straight to the Southern Landfill or pollute our soils, waterways and coastlines.

¹ <https://www.eunomia.co.uk/reports-tools/is-net-zero-enough-for-the-materials-production-sector/>.

² Waste Free Welly template submission accessible here: https://docs.google.com/document/d/11FE-M9omhfQMj8l3kU7EMXi_WjTg6SoJuyQqQcK1Y



Figure 1 Last year, Te Herenga Waka - Victoria University of Wellington avoided the creation, use and disposal of 200,000 disposable coffee cups through its reusables only policy for on-campus cafes

11 Do you have further comments on Objective 2 and/or related suggested priority actions?

The Rubbish Trip supports the intent of this Objective to increase access to waste reduction for Wellingtonians. Through more than 5 years of nationwide behaviour change work on zero waste in Aotearoa, we know that providing waste minimisation information to individuals and businesses (and, to be honest, councils and central government as well!) isn't enough to actually change behaviour and practices. There are many barriers to people, businesses and institutions adopting new behaviours and practices, even when they know these are technically an 'option'. These barriers are often systemic and relate to the fact that the linear economy is subsidised and normalised, making it de facto more convenient, and artificially cheaper, which increases its attractiveness given most people are time-poor and stretched financially.

Local and central government have an important role in levelling the playing field between the linear and circular economies so that the latter can gain more of a foothold and thereby become more accessible and attractive.

With this in mind, we support the objective and there are a lot of gems that appear throughout the commentary that demonstrate focus on waste reduction across the waste hierarchy, including repair, library and rental services, and statements that show an understanding that the reasons why services like these aren't accessible relate to wider issues that council could help to address, such as skills shortages, economics and access to space. Many of these gems could be better brought to the fore with a clearer overarching structure and purpose to this section, and clearer exploration of what, specifically, council will do.

First, we recommend rewording the second clause of the objective so that it says: "we aim to make it convenient for residents, businesses and consumers to **reduce and** recycle their waste". This more adequately captures the range of initiatives that the following commentary describes, including sharing and repairing activities, which aren't captured by the term 'recycling'.

We also strongly agree with the Waste Free Welly template submission that the commentary's focus should cover "**how to make low-waste living easier and more accessible for Wellingtonians**. This includes making it easier for people to 'do the right thing' and recycle and repair more items, and also making it easier to buy goods without packaging, and to consume less."

Making it easier to consume less means increasing the prevalence of circular business models that enable people to access goods that they need without having to own one or buy new. This means the growth of things like libraries and rental services (e.g. the public library for books and the public transport system, but also Toy Libraries, the Newtown Tool Library, Aro Video, laundromats, car sharing services like City Hop and Mevo etc.). We agree with the Waste Free Welly template submission that the sharing economy could receive much more attention in this strategy, along with clarity around what the Council thinks it can do to support these services to exist and flourish so that they are more accessible and attractive to Wellingtonians.

We are encouraged that the strategy clearly recognises the value of the secondhand economy for reducing waste and consumption. However, we note the statement in the Strategy that buying secondhand carries a stigma. This statement is made more than once but is never referenced with any source that provides evidence for this – is the council proposing to put resources towards challenging this stigma? If so, given the finite amount of resource for promoting and growing circular business models, we think more evidence is probably needed to show that this stigma exists and that it is significantly blocking people from participating in the secondhand market in Wellington, to justify the resource expenditure. We note the national success of platforms like TradeMe that thrive off secondhand sales and the number of secondhand stores lining Cuba Street, and wonder whether barriers to shopping secondhand relate more to convenience and the user interface of some outlets, as opposed to a generalised stigma.

We agree with the Waste Free Welly template submission that the Council's description of the reuse economy in this section is too narrowly focused on the secondhand market. The reuse economy is much broader than this – we note the description of the reuse economy outlined on pages 24-29 of the Waste Free Welly Working Draft Zero Waste Plan,³ which covers:

- the secondhand market, whether facilitated by resource recovery operators like The Tip Shop, repair and resale operations like ReBicycle EkeRua, or other platforms like Op Shops and TradeMe
- Repair businesses and activities, including LT Campbell Ltd, Weta Guitars and Vanguard Orchestral, BikeSpace, and repair cafes facilitated by Sustainability Trust and Hopper.
- Reuse systems, including reusable serviceware initiatives (like Again Again), zero waste groceries & refill stations (like Hopper Refill and Good Housekeeping), loose produce at markets, products using reusable packaging systems (e.g. YumJar, Hardie Boys, Solid Oral Care, Eketahuna Country Meats, Brooklyn Creamery etc. etc.)

We would love to see the capital city's zero waste strategy discuss the full scope of the reuse economy in more detail, and outline how Council will increase opportunities to participate in the reuse economy, so that living a low-waste lifestyle is easier and more convenient for Wellingtonians. For example, we think the strategy could include targets around increasing access to reuse economy outlets around the city, e.g. increasing:

- the number of grocery refilleries in the city, particularly suburbs
- increasing the number of hospitality outlets operating reusable serviceware systems
- increasing the number of repair cafes in the city

Such targets would require some baselining of current levels of activity in the reuse economy, which Council could also commit to do in the Strategy.

We are heartened to see the strong commitment to **actively support developing reuse and repair services**. More of these services will help Wellingtonians to keep the products they own in circulation for

³ <http://localmaking.org/wp-content/uploads/2022/03/A-Zero-Waste-Plan-for-Wellys.pdf>

as long as possible. We are pleased that both local community repair hubs and commercial repair services are included in the scope of initiatives Council can support.

We echo the words of the Waste Free Welly template submission in relation to resource recovery that:

“Convenient access to drop-off locations to recycle a wider range of products is important. I/we are pleased that the council has suggested **establishing a network of resource recovery facilities**, and **partnering with community and social enterprises** to deliver this; these organisations are deeply connected to local communities and are well-placed to develop the network with a user-centred design focus. Wellington’s emerging resource recovery network is already undertaking **activities across the waste hierarchy**, and contains many innovative models for co-locating reduce, reuse, repair and compost activities, delivering services, engaging communities, and supporting behaviour change. Council’s strategy could support more of this.”

An example of a new co-located resource recovery space that brings together reuse businesses and composting services is the Kaicycle-led site in Rongotai.

14 Do you have further comments on Objective 3 and/or the related suggested priority options?

The Rubbish Trip is supportive of the intent of this objective to grow the infrastructure and systems needed to increase reuse, recycling and composting in Wellington. However, we are “undecided” about some of the priority actions because they do not adequately take into account the existing services in the city that are already working to circulate resources (some for many years now) and whose existence gives Wellington a ‘headstart’ in achieving Objective 3. By overlooking these services in the commentary for this objective, the priority actions do not consider how Council could meet (even if just partially) the objective by working with/supporting these existing services. If delivered as currently written, the priority actions could actually undermine the viability of these existing services, which is counterproductive (especially when Council has already invested in some of these facilities).

The Rubbish Trip agrees that separate collection and processing of **organic material** is a priority for reducing both waste and emissions from landfill, but the Strategy currently singles out the development of a single large facility combined with a kerbside collection to meet all needs. This approach is out of step with other parts of the strategy, which aim to build supplier diversity and capability. **Diversity in collection and processing options** enables servicing of user groups with specific requirements (e.g MUDS), creates opportunities for innovation, creates different products to suit particular markets and builds system resilience.

Furthermore, this approach overlooks Wellington’s existing successful composting service providers and their processing infrastructure - many of which have received Council funding, like Capital Compost, Kaicycle, Why Waste, and composting hubs at community gardens and City Housing complexes. Where do these organisations and their facilities and services sit in the Council’s vision for a zero waste Wellington? How will they be supported to continue and operate alongside a large facility and kerbside collection? Has the Council considered how these organisations’ models also align with the Strategy’s **Proximity Principle** by keeping organic materials circulating as locally as possible?

We support the rest of the commentary in the Waste Free Welly template submission in relation to this question, including the suggested rewording of both the objective and the outcome of this objective (as well as the reasoning for these rewords). For avoidance of doubt, these are:

- Objective: “The infrastructure and systems to **reduce consumption and** increase resource circularity **is in place are established** – we aim to **decrease virgin material use and** recover and process materials to regain value from resources.”
- Outcome: “In Wellington, products are shared and reused, materials are recycled and composted, and our surrounding environment is regenerated.”

17 Do you have further comments on Objective 4 and/or the related suggested priority actions?

The Rubbish Trip supports the answer to this question set out in the Waste Free Welly template submission.⁴

18 Do you have any other comments to make on the overall direction of the Zero Waste Strategy?

We are supportive of the Council’s initiative in generating a Zero Waste Strategy and feel it is a big and positive step forward for our city. We are optimistic that it will support Wellington’s transition to becoming a more sustainable, inclusive and healthy place to live, and that it will play an important role in shaping the development of a more ambitious Regional Waste Management and Minimisation Plan.

We have five overarching comments to make in relation to the overall direction of the Zero Waste Strategy:

1. Use of language and terminology
2. Appreciation of the current baseline/lay of the land of circular/zero waste activity in Wellington – i.e. where are we starting from?
3. Targets and Principles
4. Focus waste types
5. Allocating roles and responsibilities

1. Use of language and terminology

The Rubbish Trip is over the moon that the Council has committed to the language of a ‘zero waste’ strategy for Wellington. This is not only symbolically important, it also opens the door to a wide range of learnings, case studies, strategies and action plans that have already been developed and implemented, or are being further improved, by other municipalities around the world that have also committed themselves to zero waste, including Zero Waste Cities and the C40 Cities group (which includes Auckland). It also connects Wellington into the more than 20 years of practical experience, research, resources and literature that has accrued in the area of pursuing zero waste, such as the Zero Waste Masterplan documents, the Zero Waste Academy at Massey University, and the work of Envision in New Zealand in the early 2000s.⁵

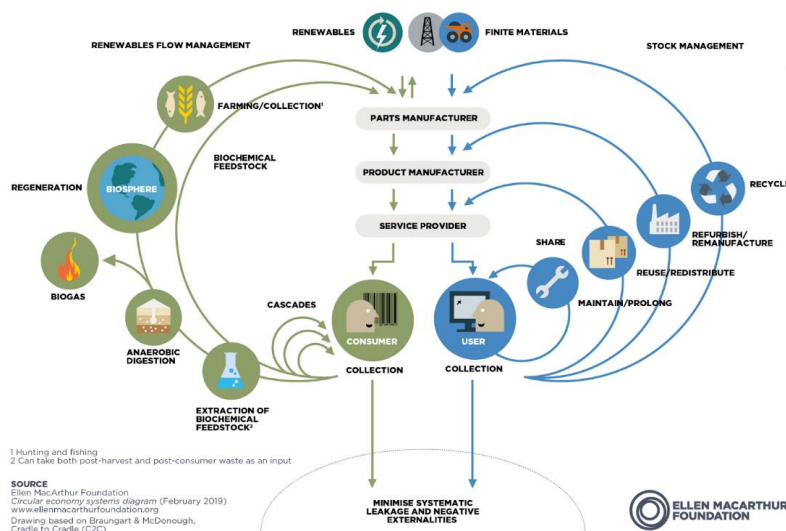
Having said that, we are concerned about the repeated inaccuracies in language and in the presentation of fundamental principles of zero waste and the circular economy throughout the Strategy. We would like to see these corrected before the Strategy is finalised because it affects our ability to fully understand the overall direction Council is setting with the Zero Waste Strategy. We completely agree with the Waste Free Welly template submission that these problems could be addressed through the exercise of generating a glossary of key terms and concepts, against which the language of the Strategy is then aligned. Apart from correcting inaccuracies, a glossary would have the additional benefit of making the document more accessible and understandable to Wellingtonians. Some examples of confusing language/terminology include:

- **Applying the concept of “regeneration” to resources and the technical loop of the circular economy.** The concept of “regeneration” comes from the third pillar of the circular economy, which is to “regenerate nature”, and applies to the biological loop of the circular economy. It is correct to say that some resources can be used to regenerate nature – such as organic waste being composted to build soils. It is incorrect to say that organic waste or plastics or electronics are “regenerated” – correct terms might be “reused” or “recycled” or “composted”, depending on the context, and what is happening to the product or materials.

⁴ https://docs.google.com/document/d/1lFE-M9omhfQMj8l3kU7EMXi_WicTg6SoJuyQqQcK1Y

⁵ https://www.no-burn.org/wp-content/uploads/2022/09/GAIA_Zero-Waste-MasterPlan_FINAL.pdf;
<http://www.entrust.org.nz/reports-2/>

- **Using “reuse” and “repurpose” interchangeably.** Reuse and repurpose are different concepts, with different outcomes when implemented. Reusing is more circular and efficient because it keeps products performing the same or similar purpose with each reuse cycle, whereas repurposing puts products to a different purpose than what they were originally made for. For example, a glass bottle of milk is reused when collected back and washed by the producer to be filled with more milk for sale, thereby displacing the need for a new glass bottle to be produced. It is repurposed when a resident keeps it to use as a flower vase, or fills it with wax to become a candle. Repurposing saves the bottle from landfill, but doesn’t achieve the resource conservation outcome of ‘reuse’, which is displacing the need for a replacement product to fulfill the original purpose. The concepts should be used more precisely in the Strategy document.
- **Insufficient distinction between product circularity and resource circularity** - concepts like “reduce” and “reuse” have different meanings when applied to resources, compared to when they are applied to products, with particularly different implications for business models. It should be clearer in the Strategy when Council is talking about product circularity (facilitated through reduce and reuse business models) and when Council is talking about resource circularity (facilitated through recycling and composting). One of the Strategy’s overarching principles is “Materials reuse” - it is unclear what this means because ordinarily products are reused (as reuse involves no reprocessing), whereas materials are recycled (because usually reprocessing is required to get materials to a form where they can recirculate). Reuse is distinguished from recycling and placed higher up in the waste hierarchy because unlike recycling, it conserves both the material *and* the embodied energy of a product.
- **Using the phrases “sharing economy”, “circular economy” and “reuse economy” interchangeably** – these concepts aren’t interchangeable - the reuse economy and sharing economy refer to the widespread application of two different circular business models, within the overarching circular economy umbrella. In other words, if the Ellen MacArthur butterfly diagram (below) represents the circular economy, the sharing economy and the reuse economy represent different cascades within the technical loop on the right.



While these matters might seem pedantic these are foundational terms in zero waste and circular economy theory. Misusing them creates a lack of clarity about strategic direction and the trajectory of the action plans the Council intends to lay down, e.g. is Council actually aiming for zero waste, or is Council

reframing zero waste to something that looks more like a tweaked BAU approach? This lack of clarity and precision isn't appropriate for the Zero Waste Strategy of New Zealand's capital city.

2. Appreciation of the current baseline/lay of the land of circular/zero waste activity in Wellington – i.e. where are we starting from?

The Strategy has a good grasp of where the gaps are in Wellington's economy in terms of achieving zero waste and circularity. Clearly, more business activity needs to shift up the waste hierarchy and resource recovery activities and their accessibility need to be expanded and strengthened. However, the story of what is actually occurring in the city already in terms of zero waste and circularity is lacking. It is true that a lot of existing reuse/reuse business models, composting, and community resource recovery activity in Wellington are niche. However, they still offer real-world examples that can help Wellingtonians to connect with what a more zero waste city could look like in the future, and the types of initiatives that can be supported to help us get there. Furthermore, it lifts up the confidence and viability of existing services to be recognised or acknowledged as 'on the right track'.

The Rubbish Trip has produced regional zero waste guides for the whole of New Zealand that focus on itemising and showcasing the businesses and community organisations that offer reduction and reuse products and services in the local area.⁶ When we deliver talks and presentations around the country, locals are often surprised to discover how much is already happening where they live that they hadn't already noticed. In Wellington, in addition to these resources, talks and presentations, we have also run several zero waste walking tours through the central city – there is an awful lot to showcase. These existing organisations can be understood as an asset to Council because they give Council a headstart in achieving a lot of the objectives and targets set out in this draft Strategy. Without identifying them, it makes it unclear whether or not Council knows that they exist, let alone whether Council has a plan to work with them or support them.

Accordingly, we agree with the Waste Free Welly template submission that the final strategy should be amended to include: "Identification of the circular, zero waste initiatives that already exist in the city and how these could be scaled up or worked with to help Council to achieve its objectives more quickly. For example, existing sharing/service-based businesses, reuse and repair initiatives, compost service providers and community-based resource recovery initiatives (if understanding of these initiatives is lacking, then a mapping and stocktake exercise should be included in the Priority Actions of Objectives 1, 2 and 3)."

3. Targets and Principles

Overall, we are supportive of the principles that underpin the Strategy (though, note our comment about "Materials reuse" above). We are particularly encouraged by the proximity principle, which we see as essential for both a resilient resource recovery sector, and more sustainable business models that can deliver waste-free products and services. We support the application of the Tūpiki Ora principles and think they could be better integrated throughout the Strategy to bring them down from the high level so that a clear pathway to their practical implementation can be identified, and accountability for this upheld.

The Rubbish Trip support the targets in the Strategy document. However, we aren't fully sure how ambitious they are because key terms like "waste" and "landfill" are not defined, making it unclear whether the targets refer to all waste from the city and all landfills, or just council managed waste and the Southern landfill, and whether recycling is included in the kerbside waste reduction target or not.

We agree with the Waste Free Welly template submission that the targets in the Strategy must be accompanied by indicators and a clear public framework for monitoring and tracking progress against the targets so that Council is accountable for achieving them.

The Rubbish Trip also believes there could be greater use of targets that go beyond waste tonnages and emissions from waste in landfill, to look at achieving a measurable and quantitative increase in the

⁶ <https://therubbishtrip.co.nz/regional-shopping-guide/regional-zero-waste-shopping-guides/>

prevalence of certain activities, outcomes or initiatives that support achievement of the Objectives. For example, a non-exhaustive list of such types of targets include:

- All Council facilities, venues and events and buildings that host them free of single-use products and bottled water by [insert date].⁷
- At least 10 dedicated zero waste grocers (online or brick and mortar) operating in Wellington City by [insert date]. (currently there are 3).⁸
- All multi-unit dwellings serviced by onsite composters or an offsite provider by [insert date].
- At least 30 Living Compost Hubs across Wellington City by [insert date].⁹
- 30 sharing libraries and regular repair cafes across the City by [insert date].¹⁰
- 10 resource recovery centres across Wellington City by [insert date].¹¹
- All hospitality outlets offering reusable serveware options for takeaway by [insert date].

4. Focus waste types

We support the focus waste types and think it is useful to have such a focus to drive more targeted and tailored waste minimisation actions.

In relation to organics, we reiterate our disappointment that existing composting service providers and diverse models for food waste diversion are not recognised in the Strategy for reducing this target waste stream.

In relation to plastics, packaging and consumables, we think the impact of these waste streams, particularly plastics and packaging, could include discussion that goes beyond landfill and considers their leakage into the environment as plastic pollution (statistics in relation to plastic pollution are referenced earlier in the Strategy, but not linked back in the discussion of the focus waste types and the rationale for their selection as a focus).

We are also disappointed that the potential to reduce plastics, packaging and consumables via top of the waste hierarchy activity is not consistently carried through in the Strategy. For example, even in Objective 1, which relates to waste-free products and services, there is a statement that products should have “home compostable or recyclable packaging” – there is no mention of unpackaged products or reusable packaging (which would be the waste-free options).

We also question the wisdom of referring to home compostable packaging as a viable solution in light of the research around potential harm such packaging can do to soils,¹² the Ministry for the Environment’s position statement on compostable packaging last year,¹³ and the fact that local commercial composters including Kaicycle and Capital Compost have partial or total restrictions on accepting compostable products and packaging. Given most residents do not have their own composts (hence organic waste

⁷ Based on target ideas on pages 30-36 of Waste Free Welly’s Zero Waste Plan: <http://localmaking.org/wp-content/uploads/2022/03/A-Zero-Waste-Plan-for-Wellys.pdf>.

⁸ Based on target ideas on pages 30-36 of Waste Free Welly’s Zero Waste Plan: <http://localmaking.org/wp-content/uploads/2022/03/A-Zero-Waste-Plan-for-Wellys.pdf>.

⁹ <https://www.livingcomposthubs.org.nz/about/hubs>

¹⁰ This is based on the Scottish target of 100 new sharing libraries and repair cafes by 2025 (there were 25 when the target was set in 2022): <https://edinburghtoollibrary.org.uk/2022/a-scottish-network-for-share-and-repair-what-does-it-all-mean/>.

¹¹ Based on Auckland City Council’s goal of a network of 12 community resource recovery centres across the city in their 2018 Waste Management and Minimisation Plan (they have so far achieved 10): <https://www.aucklandcouncil.gov.nz/plans-projects-policies-reports-bylaws/our-plans-strategies/topic-based-plans-strategies/environmental-plans-strategies/Pages/waste-management-minimisation-plan.aspx>. As noted on p.45 of the Waste Free Welly Zero Waste Plan in relation to Auckland: 9 Community Recovery Centres (CRC’s) are already operational, 3 are in development and the medium term goal is to establish 21 plus two larger resource recovery parks. These 23 sites will form part of Auckland’s Resource Recovery Network which will also include commercial, social and community enterprises working towards zero waste by 2040. The long term goal is 64 Community Recycling Centre’s 1:25,000 pop.




¹² <https://takeawaythrowaways.nz/blog/is-compostable-serveware-actually-safe-for-people-and-planet-part-one>.

¹³ <https://environment.govt.nz/assets/publications/compostables-packaging-position-statement.pdf>.

being a focus waste type), it makes no sense to encourage home compostable packaging when this would only continue the linear model of unnecessary resource use to generate single-use packaging that will just end up in landfill and generate methane.

5. Allocating roles and responsibilities

To bring everyone along, the Strategy needs to give all players in the system a clear understanding of where they stand and what is expected of them, including how they might need to work together. The Strategy could provide more detail in these areas. Currently, the primary roles and responsibilities seem to relate to what Council will do, and what residents should be encouraged to do. This gives the Strategy quite a heavy tilt towards individual responsibility, to be created via public information/education/nudge campaigns. The Rubbish Trip strongly believes that more focus needs to be given to the proactive role that business and other enterprises and organisations must play in transitioning the city's economic architecture from a line to a circle and, in turn, the role Council will play in supporting, incentivising, and in some cases simply requiring, businesses and organisations to get this transition underway more quickly.

	Respondent No: 53	Responded At: Feb 28, 2023 16:34:59 pm
		
Q1. Are you making a submission as an individual or organisation?	Organisation	
Q2. Name	not answered	
Q3. Name of organisation	Kaicycle Incorporated	
Q4. Would you like to make a public oral submission?	Yes	
Q5. Please fill in your email address/contact details so we can contact you to organise an oral submission		
Q6. How much do you agree or disagree with the following statement: The strategy provides clarity on council's direction for reducing waste?	Agree	
Q7. Do you support or oppose Objective 1? Products and services provided in Wellington are waste free – we aim to avoid unnecessary resource use and to design waste out	Strongly support	

<p>Q8. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 1.</p> <p>The suggested priority actions are: • Deliver the benefits of reuse and waste prevention through active use of Council regulations, compliance activities and enforcement • Deliver lasting behaviour change interventions by making people understand the benefits of change and then help them make that long term change easy • Work with partners and stakeholders to empower individuals to have courage to make a change in the world by inspiring individuals to reduce waste and live a more sustainable life • Work with Central Government agencies to shape policy decisions that can be developed into actions that prevent waste • Transform Wellingtonians relationship with packaging • Work with Mana Whenua, partners and stakeholders to support the redesign of systems, including changing design and production, creating new markets for reuse and recycling and inspiring Wellingtonians to cut waste, save resources and reduce Greenhouse Gas emissions • Encourage businesses, social enterprise and charities to create local and regional markets for waste materials.</p>	<p>Agree</p>
<p>Q9. Do you have further comments on Objective 1 and/or related suggested priority actions?</p>	<p>Please see Kaicycle's detailed response in the attached submission document</p>
<p>Q10. Do you support or oppose Objective 2? Waste reduction is attractive and accessible to Wellingtonians – we aim to make it convenient for residents, businesses and consumers to recycle their waste.</p>	<p>Support</p>

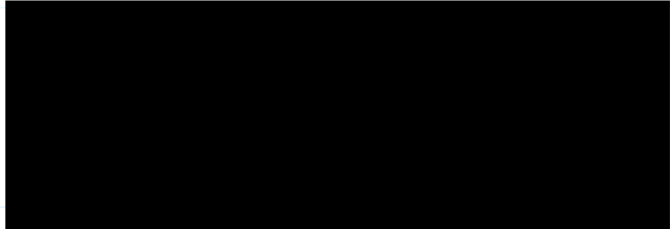
<p>Q11. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 2. The suggested priority actions are:</p> <ul style="list-style-type: none">• Delivery of consistent, equitable and accessible waste collections• Manage funds and revenues to support Wellington's reuse, re-purpose and recycling capacity by creating a catalyst for other investment• Deliver value for money and sustainable waste services to Wellingtonians• Innovation encouraged to support delivery of Wellington's transition to a zero-waste future• Monitoring and evaluation of waste arisings (salvage of secondary or waste products) to support effective policy making and insights• Deliver lasting behaviour change interventions by making people understand the benefits of change and then helping them make that long term change easy• Work with Central Government agencies to inform and shape system changes• Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington• Increase the amount of material that is recovered, reused and recycled to minimise waste and reduce the amount of virgin materials used in production• Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery.	<p>Agree</p>
<p>Q12. Do you have further comments on Objective 2 and/or related suggested priority actions?</p>	<p>Please see Kaicycle's detailed response in the attached submission document</p>
<p>Q13. Do you support or oppose Objective 3? The infrastructure and systems to increase resource circularity are established – we aim to recover and process materials to regain value from resources.</p>	<p>Support</p>

<p>Q14. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 3. The suggested priority actions are: • Support the provision of consistent, equitable and accessible kerbside waste collections for Wellingtonians • Work together with households, producers, collectors and reprocessors to extract the maximum value possible from food that would otherwise be wasted • Implement a kerbside organic collection and processing service to generate biofertilisers and renewable energy from organic waste • Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington • Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery • Create a waste ecosystem that demands and influences the right behaviours for desired outcomes • Support the creation of markets for secondary materials.</p>	<p>Undecided</p>
<p>Q15. Do you have further comments on Objective 3 and/or the related suggested priority options?</p>	<p>Please see Kaicycle's detailed response in the attached submission document</p>
<p>Q16. Do you support or oppose Objective 4? Waste that cannot be avoided, reduced, reused, or recycled is managed safely – we aim to treat waste infrastructure built today as a finite resource and carefully manage it.</p>	<p>Strongly support</p>
<p>Q17. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 4. The suggested priority actions are: • Manage the treatment and disposal of sludge • Provide for and manage emergency waste • Ongoing management of the Southern landfill to support Wellington's transition to a zero waste city • Work with partners and stakeholders to scale up interventions to recover and divert as much waste from landfill and ensure that any remaining waste is appropriately managed at Southern Landfill to protect our environment.</p>	<p>Agree</p>
<p>Q18. Do you have further comments on Objective 4 and/or the related suggested priority actions?</p>	<p>We fully support all of the points made in the submission by Waste Free Welly, including the rewording of the objective.</p>

Q19. Do you have any other comments to make on the overall direction of the Zero Waste Strategy?

Please see Kaicycle's detailed response in the attached submission document

Q20. Please attach any additional documents/information to support your submission.



Submission on WCC's Zero Waste Strategy: He anamata para kore mō Pōneke - A zero waste future for Wellington



Kaicycle

28 Feb 2023

Please find Kaicycle's responses to **questions 8, 11, 14, 17 and 18** of the online submission form for Wellington City Council's proposed Zero Waste Strategy. These questions ask for comments on each Objective, and associated priority actions.

Q8. Do you have further comments on Objective 1 and/or related suggested priority actions?

We fully support all of the points made in the submission by Waste Free Welly.

Although Kaicycle is an organisation already committed to waste reduction and diversion, we still struggle to avoid some substantial waste streams due to a lack of options. For example, one of Kaicycle's biggest waste streams is 40L bags of seed raising mix which the farm team buys in single-use plastic bags, which currently go to landfill (not clean enough to send to soft plastics recycling). We have not found any appropriate alternatives available in Wellington (e.g. Capital Compost does not produce seed raising mix). Kaicycle is working towards making our own seed raising mix - particularly with the more reliable production of compost our new facility will enable - as it would completely eliminate the need for any packaging. However, Kaicycle currently lacks the time, staff capacity, and financial resources to do so.

This demonstrates that providing information to enable **behaviour change**, even if coupled with a willingness to change, **does not necessarily lead to waste reduction - waste-free alternatives must be made more readily available**. Kaicycle encourages Council to clarify what can be done to make waste-free products and services (not just waste diversion) more available and accessible, and commit to investing in those options. This includes Council committing to walking the talk in its own teams and operations. One example could be investigating making smaller quantities of Capital Compost products in reusable packaging options instead of single-use plastic bags.

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In relation to the Priority Action to “Transform Wellingtonians relationship with packaging”, Kaicycle also believes Council could use Objective 1 to **support and invest in reusable packaging systems** to help reduce the impacts from compostable (and recyclable) packaging, among other forms of single-use packaging.

We note that in the Strategy at the top of p. 57, the commentary suggests that Objective 1 could be advanced by “ensuring products... have home compostable or recyclable packaging”. Referring to these types of packaging, but not to reusable packaging, is out of step with the principles behind the Objective; both compostable and recyclable packaging are single-use products that require some degree of virgin feedstocks, and are downstream solutions to diverting waste that has already been created, rather than upstream solutions (such as reusable packaging systems) that are based on designing out waste from being created in the first place.

This is an important issue for Kaicycle as we receive a lot of compostable packaging in our food scraps collection service. We recently [officially opted to stop accepting all types of compostable packaging \(except compostable bin liners we use for collections\) in our food scraps collections](#), and have provided messaging across multiple channels to inform customers and supporters of this change. However, customers still add compostable packaging to our collections - our Compost Managers hand sort and remove as much of these from our feedstocks before composting, and have no choice but to send this packaging to landfill.

Kaicycle seeks to avoid compostable packaging for a variety of reasons:

- Compostable plastics do not decompose adequately in our composting conditions, leaving behind plastic fragments in our compost
- Compostable plastics are frequently confused with non-compostable plastics, creating contamination
- All compostable packaging, including ‘plastic-free’ fibre-based products, may contain harmful/toxic additives like PFAS which we do not want in our compost/soil for growing food, and there is no transparency around packaging ingredients.
- Ultimately, compostable packaging is single-use - they require the use and extraction of virgin (including non-renewable) materials, unnecessary and unsustainable land-use (to grow crops for feedstocks), excessive transportation, and more.

Kaicycle supports the Ministry for the Environment’s 2022 position statement on compostable products which outlines many of these issues,¹ and encourages WCC to align with this central government position.

While Kaicycle continues to develop comms, as well as disincentives (e.g. a warning system resulting in fines), to encourage our customers to avoid compostable packaging, Council support for a shift to reusable packaging systems would be a more effective way to reduce the impacts of compostable (and other forms of single-use) packaging mentioned above. It would simplify Kaicycle’s collection and sorting processes, and improve the quality of our feedstocks

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<https://environment.govt.nz/publications/compostable-products-ministry-for-the-environment-position-statement/>

(and resulting compost). **We encourage WCC to commit to reusable packaging under Objective 1.**

Q11. Do you have further comments on Objective 2 and/or related suggested priority actions?

We support organic waste diversion being a key focus area for the Strategy for all of the reasons outlined in the commentary under Objective 2. Kaicycle started its food scraps collection and composting service in 2015 with fewer than 10 customers as a way of addressing the lack of options for organic waste diversion in Wellington. Today, Kaicycle collects food scraps from approximately 150 households and 70 businesses, diverting roughly 40 tonnes of food scraps per year from landfill.

Kaicycle has grown consistently since its humble beginnings as a volunteer-run operation. Now a professional enterprise, Kaicycle's growth over the last year has accelerated. Kaicycle is in the process of establishing a new composting facility in Rongotai (aiming to be fully operational by mid-2023) that will increase our processing capacity by another 90 tonnes per year, raising our total diversion rate to 130 tonnes and unlocking Kaicycle's services to another 400-odd residents and businesses in Wellington. While 130 tonnes will still be a relatively small dent in the quantity of organics currently going to landfill in Wellington, our model is intended to be replicable. With adequate support, Kaicycle could establish multiple new facilities and expand its collection services over the coming years, greatly increasing our diversion rate.

In our view, the commentary on **Objective 2 (particularly p. 61) misses the opportunity to build on Kaicycle's strengths and growth trajectory, and fasttrack the establishment of a network of options for diverting organics from landfill.** A kerbside collection service will likely be an important part of the mix, but will be very difficult, inefficient, and in some cases impossible to implement across the city, being unsuitable for collecting food scraps from particular areas, dwellings and businesses (such as MUDs, institutions, food & beverage producers etc.).

Kaicycle has been trialling systems to make diverting organic materials more convenient, efficient, and more widely accessible. For example, we currently have two small-scale on-site composting hubs (one at Sustainability Trust in the CBD, and one at Berhampore Community Orchard) that serve residents and businesses in the immediate vicinity via a drop-off (rather than collection) model. We also have the drop-off option available for the local community at our larger composting site at Kaicycle Urban Farm in Newtown, and will offer a drop-off option at our new Rongotai site. The drop-off model is half the price of Kaicycle's collection service and has been proven to work in highly urbanised central city areas as well as suburbs, giving it good potential to be rolled out further. It is also an excellent example of the Zero Waste Strategy's '**Proximity Principle**'.

Apart from its composting services, Kaicycle's two other core pillars - the urban farm and community outreach and education - **support and enable a much wider range of positive outcomes, including waste reduction**, than if we provided composting services only. For example, the localised, place-based nature of our network of urban farms and partner projects (where composting happens) helps to develop a community's sense of connection to (and responsibility for) where their 'waste' goes and what happens to it beyond composting. These connections also give Kaicycle's food production arm direct access to 'markets' for the compost we produce (which is used by our urban farm and by community gardens and food resilience initiatives all over Wellington). By providing hyper-locally grown food to Wellingtonians on the day of harvest reduces the need to package produce and reduces food waste by cutting out supply chains. Finally, we offer education via workshops, comms, events, volunteer sessions, and more, that share food growing, composting and food waste prevention skills for households and businesses.

We fully support all of the points made in the submission by Waste Free Welly, including the **rewording of the objective**. Having more convenient and affordable access to reuse, repair, sharing, and resource recovery services and facilities would enable Kaicycle to reduce its own waste, while also providing opportunities for Kaicycle's services to be made more accessible by being co-located at some of these facilities.

The Rongotai site that we have established, thanks to Council funding, is a collaboration with four other small social enterprises, two of which are zero waste businesses (Nonstop Solutions and Yum Jar). This site is an excellent working model for what one part of a resource recovery network could look like, and demonstrates how multiple services can be co-located in one site in a way that is mutually beneficial. Kaicycle is keen to share our expertise and experience, and work with Council, Mana Whenua, businesses, non-profits, and other stakeholders to integrate our services into a connected network of waste reduction facilities.

Q14. Do you have further comments on Objective 3 and/or the related suggested priority options?

We fully support all of the points made in the submission by Waste Free Welly, including the **rewording of the objective**. We also are encouraged that the Strategy makes the link between processing organics diverted from landfill and soil health, carbon sequestration, climate resilience, and food production. To support these, the Strategy should align with the Council's recently released Food Action Plan, Te Anamata Ā-Kai o Tō Tātou Tāone | Our City's Food Future, also to help develop markets for organics processing outputs.

However, **we have concerns about the framing and language around the infrastructure for dealing with organic waste**. This is primarily why we are 'undecided' on whether the suggested priority actions appropriately deliver on Objective 3.

Page 67 of the Strategy talks of investing in an organics processing 'facility' and 'plant' in the singular. This biases the opportunity for organics processing in Wellington in favour of a singular, large-scale facility, without considering the potential for (and benefits of) a network of facilities at a variety of scales. We agree with Waste Free Welly's submission that this is not only inconsistent with other parts of the strategy, which advocate for a diversity of options and delivery mechanisms (e.g. resource recovery network), but neglects the opportunities of a plurality of collection and processing options, which are listed in Waste Free Welly's submission as: "enables servicing of user groups with specific requirements (e.g MUDs), creates opportunities for innovation, creates different products to suit particular markets and builds system resilience."

In addition, a multiplicity of options for organics processing offers a range of benefits compared to a singular facility. For example, by reducing transportation requirements and thus costs and carbon emissions, supporting urban food production/resilience, creating meaningful 'green' jobs, improving quality standards of processing outputs, and more. Having multiple facilities adheres much better to the Strategy's **Proximity Principle** by keeping organic materials circulating as locally as possible, particularly given Wellington's challenging topography and lack of space for large facilities.

We thus **suggest changing the language on page 67 from discussing "an organics processing facility" or "plant" (singular) to "organics processing facilities" or "plants" (plural).**

By reframing the opportunity for organics processing to be addressed by multiple facilities, **Council can consider that it has already begun investing in organics processing infrastructure.** Kaicycle was supported with a \$95,000 grant for our composting expansion 2022-23, which is intended to serve as a replicable model for what could be possible in multiple sites and circumstances across Wellington. In this way, Council can build on the existence of services like Kaicycle, Capital Compost, Why Waste (professional worm farm management) and others, to expand further - both in terms of new processing facilities and pilots for collecting organics from challenging sources (e.g. MUDs, businesses/institutions). Such an approach would be **more likely to achieve greater diversion** than relying solely on kerbside collections and a singular large facility.

We would encourage Council to explore opportunities for Council facilities, land, buildings, assets etc. to be part of an organics processing network model. As well as drop-off and collection sites for various types of organics materials, Council could conduct a stocktake of Council land (community centres, parks, road reserve etc.) to identify appropriate composting sites. This would require working with various teams in Council to navigate issues such as whether composting could constitute, or contribute to, 'recreational' activities - even if it contains a commercial element (in the same way that a sports club may run a bar to raise funds). The Community Composting Hubs trial being run by WCC's Community Services team provides an opportunity to gather some baseline data and experience with different sites and methods, and could help inform a stocktake of potential sites and operations.

To encapsulate all of the above, **we suggest rewording of the Priority Action** related to organic waste as follows:

~~“Implement a kerbside-Work with existing organic waste service providers to expand organics collection and processing services to generate bio-fertilisers and renewable energy from convert organic waste-materials into products that replenish soils and support local food production.”~~

We also suggest the removal of the terms ‘bio-fertilisers’ and ‘renewable energy’ above, as these are the outputs of an anaerobic digester, and **the Strategy should not bias the organics processing method/technology** before work is done to consider options. We also note that not all processing outputs are equal nor achieve the same results - the International Solid Waste Association classifies compost as a ‘soil improver’, which can support the benefits described on p. 66 of the Zero Waste Strategy, while digestate (from anaerobic digestion) is classified as a ‘soil fertiliser’, with its primary benefit being its nutrient content rather than having soil improving properties.²

Q17. Do you have further comments on Objective 4 and/or the related suggested priority actions?

We fully support all of the points made in the submission by Waste Free Welly, including the **rewording of the objective**.

Q18. Do you have any other comments to make on the overall direction of the Zero Waste Strategy?

We **fully support** the council's commitment to a zero waste future for Wellington.

We fully support all of the points made in the submission by Waste Free Welly. In particular, we would like to see a more careful and consistent use of language, terminology and imagery to describe the issues, and support a glossary being developed for this. We would also particularly like to see more clarity on **how Council intends to work with and support existing zero waste and circular economy initiatives** to grow and expand, to help achieve Council's objectives faster. Kaicycle is very keen to work with Council, Mana Whenua and other stakeholders, to develop an infrastructural plan for diverting organic waste (alongside other priority waste streams) that **does not have to wait until the sludge minimisation facility is completed** to be actioned. New infrastructure capacity can take time to develop, and we want to be part of the solution in the short, medium and long term.

²

<https://www.iswa.org/knowledge-base/benefits-of-compost-and-anaerobic-digestate-when-applied-to-soil/?v=8e3eb2c69a18>, pp. 19-20.



Respondent No: 83

Responded At: Mar 02, 2023 11:25:02 am

Q1. Are you making a submission as an individual or organisation?	Individual
Q2. Name	Karen Thomas
Q3. Name of organisation	not answered
Q4. Would you like to make a public oral submission?	Yes
Q5. Please fill in your email address/contact details so we can contact you to organise an oral submission	[Redacted]
Q6. How much do you agree or disagree with the following statement: The strategy provides clarity on council's direction for reducing waste?	Agree
Q7. Do you support or oppose Objective 1? Products and services provided in Wellington are waste free – we aim to avoid unnecessary resource use and to design waste out	Strongly support

<p>Q8. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 1.</p> <p>The suggested priority actions are: • Deliver the benefits of reuse and waste prevention through active use of Council regulations, compliance activities and enforcement • Deliver lasting behaviour change interventions by making people understand the benefits of change and then help them make that long term change easy • Work with partners and stakeholders to empower individuals to have courage to make a change in the world by inspiring individuals to reduce waste and live a more sustainable life • Work with Central Government agencies to shape policy decisions that can be developed into actions that prevent waste • Transform Wellingtonians relationship with packaging • Work with Mana Whenua, partners and stakeholders to support the redesign of systems, including changing design and production, creating new markets for reuse and recycling and inspiring Wellingtonians to cut waste, save resources and reduce Greenhouse Gas emissions • Encourage businesses, social enterprise and charities to create local and regional markets for waste materials.</p>	<p>Undecided</p>
<p>Q9. Do you have further comments on Objective 1 and/or related suggested priority actions?</p>	<p>attached</p>
<p>Q10. Do you support or oppose Objective 2? Waste reduction is attractive and accessible to Wellingtonians – we aim to make it convenient for residents, businesses and consumers to recycle their waste.</p>	<p>Strongly support</p>

Q11. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 2. The suggested priority actions are: • Delivery of consistent, equitable and accessible waste collections • Manage funds and revenues to support Wellington's reuse, re-purpose and recycling capacity by creating a catalyst for other investment • Deliver value for money and sustainable waste services to Wellingtonians • Innovation encouraged to support delivery of Wellington's transition to a zero-waste future • Monitoring and evaluation of waste arisings (salvage of secondary or waste products) to support effective policy making and insights • Deliver lasting behaviour change interventions by making people understand the benefits of change and then helping them make that long term change easy • Work with Central Government agencies to inform and shape system changes • Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington • Increase the amount of material that is recovered, reused and recycled to minimise waste and reduce the amount of virgin materials used in production • Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery.

Undecided

Q12. Do you have further comments on Objective 2 and/or related suggested priority actions?

see attached

Q13. Do you support or oppose Objective 3? The infrastructure and systems to increase resource circularity are established – we aim to recover and process materials to regain value from resources.

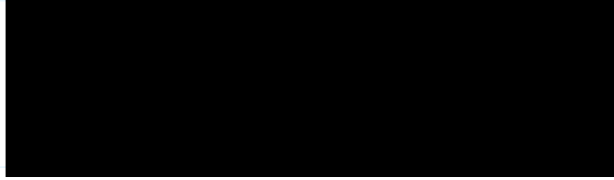
Strongly support

Q14. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 3. The suggested priority actions are: • Support the provision of consistent, equitable and accessible kerbside waste collections for Wellingtonians • Work together with households, producers, collectors and reprocessors to extract the maximum value possible from food that would otherwise be wasted • Implement a kerbside organic collection and processing service to generate biofertilisers and renewable energy from organic waste • Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington • Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery • Create a waste ecosystem that demands and influences the right behaviours for desired outcomes • Support the creation of markets for secondary materials.	Undecided
Q15. Do you have further comments on Objective 3 and/or the related suggested priority options?	See attached
Q16. Do you support or oppose Objective 4? Waste that cannot be avoided, reduced, reused, or recycled is managed safely – we aim to treat waste infrastructure built today as a finite resource and carefully manage it.	Strongly support
Q17. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 4. The suggested priority actions are: • Manage the treatment and disposal of sludge • Provide for and manage emergency waste • Ongoing management of the Southern landfill to support Wellington’s transition to a zero waste city • Work with partners and stakeholders to scale up interventions to recover and divert as much waste from landfill and ensure that any remaining waste is appropriately managed at Southern Landfill to protect our environment.	Strongly agree
Q18. Do you have further comments on Objective 4 and/or the related suggested priority actions?	see attachment

Q19. Do you have any other comments to make on the overall direction of the Zero Waste Strategy?

See attachment

Q20. Please attach any additional documents/information to support your submission.



Karen Thomas - Comments

Do you have further comments on Objective 1 and/or related suggested priority actions?

- Why does Wellington City Council provide single use plastic bags for rubbish collection to landfill? WCC could start looking at and changing its own practices.
- Why are glass containers not washed, sterilised and reused without being broken down?
- Often cannot purchase products without packaging so feel angry I am left to dispose of stuff I do not want in the first place.

Do you have further comments on Objective 2 and/or related suggested priority actions?

- Does convenience to recycle cost more than people willing to pay?
- For some households, recycling waste is not a priority.
- Concern at extra costs and charges for supporting investment, monitoring.
- Cost to repair can be more than cost of original item, so thrown away.
- Council website not comprehensive enough with info on items accepted for recycling. People don't refer to it to find most up to date info.
- Don't like sharing tools etc people not always careful about correct use or cleaning.

Do you have further comments on Objective 3 and/or the related suggested priority options?

- I strongly support the deconstruction of buildings and reusing the materials recovered.
- Not so sure about a market for plastic fence posts made from recycled plastic waste.
- DIY repairs hampered by lack of skills and by safety regulations.
- Parts not available for old appliances.
- Plastic products don't all have plastic type/code shown.

Do you have further comments on Objective 4 and/or the related suggested priority actions?

- Too much caution over asbestos removal.
- Composting toilets allowed in urban areas.

Do you have any other comments to make on the overall direction of the Zero Waste Strategy?

- The targets are an ideal and not possible. If people – individuals and businesses are not already doing all they can to minimise waste, inspiring/encouraging them will be difficult.
- Government (local and central) responsible for waste by encouraging businesses to provide and manufacture goods and services.
- Regulation does not always provide compliance and can hamper practices and innovation and waste reduction.
- I would like to be positive but peoples attitudes to waste varies/clashes.



Respondent No: 74

Responded At: Feb 28, 2023 11:02:29 am

Q1. Are you making a submission as an individual or organisation?	Organisation
Q2. Name	not answered
Q3. Name of organisation	Repair Cafe Aotearoa NZ
Q4. Would you like to make a public oral submission?	Yes
Q5. Please fill in your email address/contact details so we can contact you to organise an oral submission	[REDACTED]
Q6. How much do you agree or disagree with the following statement: The strategy provides clarity on council's direction for reducing waste?	Strongly Agree
Q7. Do you support or oppose Objective 1? Products and services provided in Wellington are waste free – we aim to avoid unnecessary resource use and to design waste out	Strongly support

<p>Q8. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 1.</p> <p>The suggested priority actions are: • Deliver the benefits of reuse and waste prevention through active use of Council regulations, compliance activities and enforcement • Deliver lasting behaviour change interventions by making people understand the benefits of change and then help them make that long term change easy • Work with partners and stakeholders to empower individuals to have courage to make a change in the world by inspiring individuals to reduce waste and live a more sustainable life • Work with Central Government agencies to shape policy decisions that can be developed into actions that prevent waste • Transform Wellingtonians relationship with packaging • Work with Mana Whenua, partners and stakeholders to support the redesign of systems, including changing design and production, creating new markets for reuse and recycling and inspiring Wellingtonians to cut waste, save resources and reduce Greenhouse Gas emissions • Encourage businesses, social enterprise and charities to create local and regional markets for waste materials.</p>	Agree
<p>Q9. Do you have further comments on Objective 1 and/or related suggested priority actions?</p>	Please refer to attached supporting document. Thank you.
<p>Q10. Do you support or oppose Objective 2? Waste reduction is attractive and accessible to Wellingtonians – we aim to make it convenient for residents, businesses and consumers to recycle their waste.</p>	Support

Q11. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 2. The suggested priority actions are:

- Delivery of consistent, equitable and accessible waste collections
- Manage funds and revenues to support Wellington's reuse, re-purpose and recycling capacity by creating a catalyst for other investment
- Deliver value for money and sustainable waste services to Wellingtonians
- Innovation encouraged to support delivery of Wellington's transition to a zero-waste future
- Monitoring and evaluation of waste arisings (salvage of secondary or waste products) to support effective policy making and insights
- Deliver lasting behaviour change interventions by making people understand the benefits of change and then helping them make that long term change easy
- Work with Central Government agencies to inform and shape system changes
- Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington
- Increase the amount of material that is recovered, reused and recycled to minimise waste and reduce the amount of virgin materials used in production
- Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery.

Agree

Q12. Do you have further comments on Objective 2 and/or related suggested priority actions?

Please refer to attached supporting document. Thank you.

Q13. Do you support or oppose Objective 3? The infrastructure and systems to increase resource circularity are established – we aim to recover and process materials to regain value from resources.

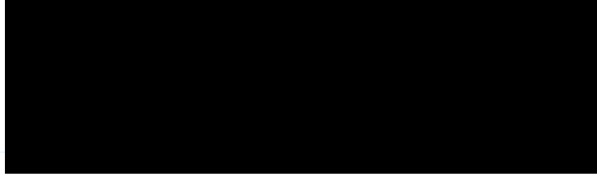
Support

<p>Q14. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 3. The suggested priority actions are: • Support the provision of consistent, equitable and accessible kerbside waste collections for Wellingtonians • Work together with households, producers, collectors and reprocessors to extract the maximum value possible from food that would otherwise be wasted • Implement a kerbside organic collection and processing service to generate biofertilisers and renewable energy from organic waste • Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington • Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery • Create a waste ecosystem that demands and influences the right behaviours for desired outcomes • Support the creation of markets for secondary materials.</p>	Agree
<p>Q15. Do you have further comments on Objective 3 and/or the related suggested priority options?</p>	Please refer to attached supporting document. Thank you.
<p>Q16. Do you support or oppose Objective 4? Waste that cannot be avoided, reduced, reused, or recycled is managed safely – we aim to treat waste infrastructure built today as a finite resource and carefully manage it.</p>	Strongly support
<p>Q17. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 4. The suggested priority actions are: • Manage the treatment and disposal of sludge • Provide for and manage emergency waste • Ongoing management of the Southern landfill to support Wellington's transition to a zero waste city • Work with partners and stakeholders to scale up interventions to recover and divert as much waste from landfill and ensure that any remaining waste is appropriately managed at Southern Landfill to protect our environment.</p>	Agree
<p>Q18. Do you have further comments on Objective 4 and/or the related suggested priority actions?</p>	Please refer to attached supporting document. Thank you.

Q19. Do you have any other comments to make on the overall direction of the Zero Waste Strategy?

Please refer to attached supporting document. Thank you.

Q20. Please attach any additional documents/information to support your submission.





W www.repaircafeaotearoa.co.nz

E [REDACTED]
[REDACTED]

28 February 2023

Kia ora Wellington City Council,

We are delighted to be able to contribute to the discussion on the proposed He anamata para kore mō Pōneke - A zero waste future for Wellington with our submission,

Please find our answers to the [submission/ survey](#) text responses below. This document has been attached to our submission on 28/02/2023.

Ngā Mihi

Brigitte Sistig

Co-founder | Repair Café Aotearoa NZ

8 Do you have further comments on Objective 1 and/or related suggested priority actions?

We support this ambitious objective, focused on preventing waste by supporting businesses to design waste out of the system through new products and services.

The supporting commentary on pages 56-59 of the document needs strengthening to live up to the objective. The commentary could paint a clearer picture of what Objective 1 really means and how it will be achieved. It could **draw the link between waste prevention and emissions reduction**, and the connection between this objective and Council's wider climate strategies.

As written, the commentary mostly describes diversion activities (i.e., what we do with waste once it has already been created), rather than waste-free systems. It should be rewritten to focus on **waste prevention, reduction and reuse practices**, to match up with the objective of "products and services provided in Wellington are waste free". These practices are about moving away from single-use, disposable and short-life products, towards sharing/library business models, durable products, repair services and product maintenance education as well as reuse systems.

Priority actions for Council to make this shift happen can include **adopting bylaws and investing in infrastructure and systems** that help the city's businesses to normalise reusable packaging systems, or that increase and make the best use of product/service sharing systems, like Mevo,

laundromats, and libraries. We endorse the notion of avoiding unnecessary resource use and designing waste out in Wellington and eliminate waste up the supply chain. Designing products to be resource efficient and repairable will save a significant volume of material use. This includes ensuring products are made to last and are repairable. As identified on p.40 in the Zero Waste Strategy draft, “for example, an electronics retailer could ask for changes to be made to the packaging, insist on use of recycled materials, and introduce return and repair solutions”.

Another action Council can take is to **commit to walk the talk** in its own practices, and embed waste-free, sharing and reuse-based purchasing and behaviours at Council and its own events, venues and facilities.

Rethinking the economic models that underpin funding, financing, partnership and procurement is a critical task for Council to achieve and properly budget and resource Objective 1 and we would like to see this included in the list of priority actions. Specifically, we would like repair to be included in the Council’s approach of allowing “only resources that cannot be reused or recycled in the landfill” (p.53 in the Zero Waste Strategy draft).

11 Do you have further comments on Objective 2 and/or related suggested priority actions?

We support the intent of this objective to make waste reduction services accessible and attractive. The commentary focuses on waste reduction across the waste hierarchy, including activities like repair, which is great. For consistency and clarity, **the second clause of the objective should be reworded** to say: “we aim to make it convenient for residents, businesses and consumers to **reduce** ~~[recycle]~~ their waste”.

The commentary’s focus should be about **how to make low-waste living easier and more accessible for Wellingtonians**. This includes making it easier for people to ‘do the right thing’ and recycle and repair more items, and also making it easier to buy goods without packaging, and to consume less. We recommend Council to consider a collaboration with Repair Café Aotearoa NZ www.repaircafeaotearoa.co.nz and offer a repair service network similar to the repair network in Vienna, Austria, which <https://www.reparaturnetzwerk.at/>.

Consuming less includes **being able to access items when you need them, without having to buy and own one (or buy new)**. We are pleased to see recognition that access to the sharing economy is enabled by libraries and rental services. The sharing economy could receive more attention in the commentary, and we recommend some clarity around what the Council thinks it can do to support these services to exist. We acknowledge that the strategy recognises the value of the secondhand economy for reducing waste and consumption too.

The document references **the reuse economy**, which is great, although limits the definition to the traditional secondhand market. The reuse economy is much broader than this and includes product delivery models that reduce single-use, such as reusable packaging and serviceware systems, like grocery refilleries. The strategy document could outline how these opportunities for

low-waste purchasing will be increased so that living a low-waste lifestyle is easier and more convenient for Wellingtonians. Also, the strategy document often uses the terms “reuse” and “repurpose” interchangeably, but these are different concepts and should be used more carefully (reusing is more circular and efficient because it keeps products performing the same or similar purpose with each reuse cycle, whereas repurposing puts products to a different purpose than what they were originally made for). A useful reference is the Ellen McArthur Butterfly Diagram <https://ellenmacarthurfoundation.org/circular-economy-diagram>

We are heartened to see the strong commitment to **actively support developing reuse and repair services**. More of these services will help Wellingtonians to keep the products they own in circulation for as long as possible. We are pleased that both local community repair hubs and commercial repair services are included in the scope of initiatives Council can support.

Convenient access to drop-off locations to recycle a wider range of products is important. We are pleased that the Council has suggested **establishing a network of resource recovery facilities**, and **partnering with community and social enterprises** to deliver this; these organisations are deeply connected to local communities and are well-placed to develop the network with a user-centred design focus. We would like to see an active collaboration between Council and Repair Café Aotearoa NZ <https://www.repaircafeaotearoa.co.nz/> as we have with the WasteWise Team at Auckland Council.

Wellington’s emerging resource recovery network is already undertaking **activities across the waste hierarchy**, and contains many innovative models for co-locating reduce, reuse, repair and compost activities, delivering services, engaging communities, and supporting behaviour change. Council’s strategy could support more of this.

14 Do you have further comments on Objective 3 and/or the related suggested priority options?

We support the intent of this objective to grow the infrastructure and systems needed to increase reuse, repair, recycling and composting in Wellington.

To better connect this objective with the overarching strategy of zero waste, some crucial words should be added to this objective so that it says: “The infrastructure and systems to **‘reduce consumption and’** increase resource circularity **‘is in place’** ~~are established~~ – we aim to **‘decrease virgin material use and’** recover and process materials to regain value from resources.”

We suggest rewording the outcome for this section to better align with circular economy principles. We are pleased to see the concept of regeneration in the strategy, but this should be an overarching aim for the environment to be regenerated. In the circular economy framework **regeneration is applied to nature, not resources**. We also suggest replacing the term **“repurposed”** with more precise and commonly understood terms, such as **“reused”**, **“repaired”**, **“recycled”** and **“composted”**. For example: “In Wellington, products are shared, **“repaired”** and reused, **“end of life”** materials are recycled and composted, and our surrounding environment is regenerated.”

We agree that separate collection and processing of **organic material** is a priority for reducing both waste and emissions from landfill, however, the strategy suggests a single large facility can meet all needs. This approach is out of step with other parts of the strategy, which aim to build supplier diversity and capability. **Diversity in collection and processing options** enables servicing of user groups with specific requirements (e.g., MUDS), creates opportunities for innovation, creates different products to suit particular markets and builds system resilience.

Food waste volumes collected, composted and processed can be expanded by reaching beyond the standardised kerbside service delivery mechanism. We believe the Council should **build on successful examples** already present in the city, many of which have received Council funding, like Capital Compost, Kaicycle, Why Waste, and composting hubs at community gardens and City Housing complexes. Including and expanding these models also aligns with the Strategy's **Proximity Principle** by keeping organic materials circulating as locally as possible.

We **strongly support** the high commitment to reducing waste from the **construction and demolition sector** including exploring deconstruction and a mandatory requirement to sort and separate at class 2 to 4 landfills.

Source separation is a key strategy for increasing diversion to reuse, recycling and reprocessing for all materials and products. Any new collection and processing systems must be fit for purpose to deliver the high-quality input streams reprocessors and second-hand markets require.

In the **short term** it would be useful and cost effective to focus on simple, quick win ways to divert more materials from landfill, alongside implementation of longer-term solutions. Improving the user experience at existing facilities (such as at the Southern Landfill), building small and medium sized organics processing capacity and expanding collection and drop-off locations.

We support the focus on **regulatory tools and compliance, monitoring and enforcement**. Enforcement is a critical mechanism for establishing and maintaining a clear bottom line.

17 Do you have further comments on Objective 4 and/or the related suggested priority actions?

We support the intent of this objective to ensure **safe disposal of waste**. We are also encouraged to see the Southern Landfill's constraint on capacity being used to motivate a change in approach by Council, residents, businesses and other organisations. This 'identity shift' where Wellington City sees itself as a place where zero waste strategies are valued and landfill space preserved as long as possible, will drive change through the system. We suggest **clearer language surrounding the landfill lifespan** to reflect the intent, such as: "We **will [aim to]** treat waste infrastructure today as a finite resource and carefully manage it, **working to preserve its capacity and lifespan as long as possible.**"

We think that the objective should consider a wider harm lens, to look beyond landfills and to encompass mitigation of the waste that escapes waste management systems. This includes:

clarifying the process for safe management of **hazardous material** including chemicals requiring treatment/disposal; clearly restating the rationale provided in the opening context pages of the Strategy for rejecting **incineration** as a safe disposal method (including the emissions consequences); and including actions to mitigate 'leakage' by plastics, microplastics, chemicals and other products and materials into the environment, as well as litter and illegal disposal.

We strongly support action to address the **cleanfill gaps** by putting in place infrastructure, but also by reducing waste at source. There is a big risk of increased illegal disposal of waste, as well as use of capacity at the Southern Landfill if this is not addressed in the short term.

Recent alarming examples of climate change related severe weather conditions as experienced in Auckland/ Northland and Hawke's Bay highlighted the need for safe cleaning of products covered in silt, e.g., soft furniture or electrical items, so they can be repaired. Resilience and safe disposal is far more than just landfills. We think the priority actions should reflect that a network of waste reduction, diversion and processing infrastructure is needed to **spread the risk and reduce vulnerability**.

We suggest adding the following wording to the Objective to reflect these issues: 'Waste that cannot be avoided, reduced, repaired, reused, or recycled is managed safely and **without harm or leakage to the environment**'.

18 Do you have any other comments to make on the overall direction of the Zero Waste Strategy?

We fully support the council's commitment to a zero waste future for Wellington.

We support the Zero Waste strategy and believe it is a positive step because it:

1. Strengthens the relationship between council and mana whenua
2. Commits to engaging, empowering and involving communities and developing partnership opportunities with community stakeholders
3. Recognises the connection between waste reduction, emissions reduction and wellbeing
4. Aligns action to reduce waste with key Council policy
5. Uses the waste hierarchy to prioritise action
Builds the Zero Waste Programme into the Council structure to support WMMP implementation and ensure budget allocation
6. Acknowledges the need to change production and consumption systems, products, materials and business models
7. Makes it clear that incineration is not part of the city's strategic vision for waste.

We support the use of the Tūpiki Ora principles to **integrate a te ao Māori** led understanding of wellbeing into the zero waste strategy. We support the value of whakapapa, as a relevant frame for thinking about how to implement practical circular economy and zero waste strategies.

We would like to see inclusion of a specific priority action under Objectives 1, 2 and 3 to **create economic development opportunities for Māori**. This would help to integrate the commitment made on p 48-49 to work in partnership with mana whenua and Māori under:

- **Pito mata** - potential for opportunities and growth
- **Mana ōrite** - looking for partnership opportunities
- **Te auaha** - develop new creative and innovative models, innovate and experiment.

The strategy document clearly connects the zero waste strategy with the **Economic Wellbeing Strategy** via circular economy principles: designing out waste and pollution, keeping products and materials in circulation for as long as possible and regenerating nature. Waste is a consequence of the ways we use our production and consumption systems to meet our wants and needs. Making this connection is a critical enabler for effective action to reduce waste at source.

We **support the principles**, they are a positive step forward and give clarity to the Council's direction on zero waste. We recommend a review of all the priority actions to ensure they are aligned with the principles and that the principles are reviewed against our language and terminology recommendations.

Language, terminology and imagery/icons should be used more carefully and consistently to accurately describe activities at each layer of the waste hierarchy and reflect circular economy principles. We think the Strategy should **include a glossary of key terms at the front**, and then the wording throughout the document should be amended to align with the glossary, so that the right words are used at the right time. At the moment:

- Key concepts, like labels from the waste hierarchy or phrases like “sharing economy” and “reuse economy”, are not always used consistently, correctly or completely.
- Images don't always reflect the content of the accompanying text (e.g. a recycling bin icon used to depict both waste and recycling).
- ‘Waste management’ is used in many different contexts, but fits best in Objective 4
- “Regeneration” is loosely used in relation to the processing of materials and resources (i.e., “recycling” or “composting”), rather than to reference regenerating nature.
- “Repurposing” and “reuse” are used interchangeably, when they are different concepts.

Behaviour change is a critical enabler. We would like to see **behaviour change** woven through the strategy in a more integrated and more comprehensive way. Empowering people and organisations to reduce waste requires a combination of structural change, mindset shifts, knowledge sharing and confidence building as well as an identity shift.

We believe the strategy as written will be hard for most Wellingtonians to engage and connect with:

- A **summary strategy** is needed for wider communication once adopted.
- **Stronger storytelling** about the **circular economy ecosystem** would help everyone buy into their part in making this strategy happen.

- The **roles and responsibilities of all the players in the system** and the relationships between them need to be expanded, with a reduced emphasis on individual responsibility and increased emphasis on collective responsibility. The strategy currently details the roles and responsibilities of residents and the Council itself yet provides disproportionately less detail on the proactive roles that business and other forms of enterprise and organisation can play (e.g., p.24).

The outline of the zero waste programme (on p.76) includes the large scale projects that the Council is currently working on, however, how future work will be integrated is not outlined. Throughout the document, there is also very little recognition of the various circular initiatives that already exist in the city. We would like to see the final version of the strategy amended to include:

- Clarification of how space will be made for the new and emerging projects, activities and initiatives identified through the WMMP and action plan development process (the diagram on p.47 reads as though the Zero Waste Programme just aims to create an action plan and WMMP document).
- Clarification of the scale of the impact projects/programmes will deliver against the targets, their relationship to the objectives and a timeline for implementation.
- Identification of the circular, zero waste initiatives that already exist in the city and how these could be scaled up or worked with to help Council to achieve its objectives more quickly. For example, existing sharing/service-based businesses, reuse and repair initiatives, compost service providers and community-based resource recovery initiatives (if understanding of these initiatives is lacking, then a mapping and stocktake exercise should be included in the Priority Actions of Objectives 1, 2 and 3).

We want to see **clear accountability** from the Council for delivery with a robust framework for tracking progress on the Strategy. Most of the priority actions are not specific, so without visibility of the full action plan it is not clear how assessing progress against these in the 18 month review will be possible. We believe the strategy does not include all the measures, indicators and targets required to track progress. We recommend the Council makes a timeline for implementation publicly available and that the Strategy includes priority actions to:

- Establish and measure progress indicators to track interim progress towards the targets and outcomes
- Develop a platform with a timeline that can regularly share data/insights on progress with Wellingtonians to create a transparent feedback loop

Reducing waste at source has a significant impact on emissions reduction as well as avoiding upstream and downstream impacts on biodiversity and ecosystems. Reducing emissions and material/product use supports the council's **Climate and Ecological emergency response**. We would like some indicators that show this contribution built into reporting on the zero waste strategy. This could be a paste of indicators already being used or developed for Te Atakura or may require new indicators that track the city's consumption emissions or material flow index.

We would like to see a clearer description of how the **requirement for a 4 to 1 ratio of rubbish** to sludge will be managed as it is a critical limitation for achieving the targets. This includes

identifying actions that could be taken prior to the Sludge Minimisation Facility becoming operational. The long lead time for the sludge project means a rapid drop in waste will be required between 2027 and 2030. In the meantime, priority waste streams that are small in volume but high impact, like electronic waste, need to be separated and diverted, and investments should be made in system changes (e.g., shifting from replacing faulty products to repairing them, spare parts collection stations and setting up more community repair facilities as well as repair businesses and expand the repair education sector) to future-proof our ability to achieve a rapid drop in waste from 2026.

 **Respondent No:** 52 **Responded At:** Feb 28, 2023 16:34:30 pm

[Redacted Name]

- Q1. Are you making a submission as an individual or organisation? Organisation
-
- Q2. Name not answered
-
- Q3. Name of organisation Waste Free Welly
-
- Q4. Would you like to make a public oral submission? Yes
-
- Q5. Please fill in your email address/contact details so we can contact you to organise an oral submission [Redacted]
-
- Q6. How much do you agree or disagree with the following statement: The strategy provides clarity on council's direction for reducing waste? Strongly Agree
-
- Q7. Do you support or oppose Objective 1? Products and services provided in Wellington are waste free – we aim to avoid unnecessary resource use and to design waste out Strongly support
-

<p>Q8. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 1.</p> <p>The suggested priority actions are: • Deliver the benefits of reuse and waste prevention through active use of Council regulations, compliance activities and enforcement • Deliver lasting behaviour change interventions by making people understand the benefits of change and then help them make that long term change easy • Work with partners and stakeholders to empower individuals to have courage to make a change in the world by inspiring individuals to reduce waste and live a more sustainable life • Work with Central Government agencies to shape policy decisions that can be developed into actions that prevent waste • Transform Wellingtonians relationship with packaging • Work with Mana Whenua, partners and stakeholders to support the redesign of systems, including changing design and production, creating new markets for reuse and recycling and inspiring Wellingtonians to cut waste, save resources and reduce Greenhouse Gas emissions • Encourage businesses, social enterprise and charities to create local and regional markets for waste materials.</p>	<p>Agree</p>
<p>Q9. Do you have further comments on Objective 1 and/or related suggested priority actions?</p>	<p>See attached supporting document.</p>
<p>Q10. Do you support or oppose Objective 2? Waste reduction is attractive and accessible to Wellingtonians – we aim to make it convenient for residents, businesses and consumers to recycle their waste.</p>	<p>Support</p>

<p>Q11. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 2. The suggested priority actions are:</p> <ul style="list-style-type: none">• Delivery of consistent, equitable and accessible waste collections• Manage funds and revenues to support Wellington’s reuse, re-purpose and recycling capacity by creating a catalyst for other investment• Deliver value for money and sustainable waste services to Wellingtonians• Innovation encouraged to support delivery of Wellington’s transition to a zero-waste future• Monitoring and evaluation of waste arisings (salvage of secondary or waste products) to support effective policy making and insights• Deliver lasting behaviour change interventions by making people understand the benefits of change and then helping them make that long term change easy• Work with Central Government agencies to inform and shape system changes• Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington• Increase the amount of material that is recovered, reused and recycled to minimise waste and reduce the amount of virgin materials used in production• Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery.	Agree
<p>Q12. Do you have further comments on Objective 2 and/or related suggested priority actions?</p>	See attached supporting document.
<p>Q13. Do you support or oppose Objective 3? The infrastructure and systems to increase resource circularity are established – we aim to recover and process materials to regain value from resources.</p>	Support

<p>Q14. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 3. The suggested priority actions are: • Support the provision of consistent, equitable and accessible kerbside waste collections for Wellingtonians • Work together with households, producers, collectors and reprocessors to extract the maximum value possible from food that would otherwise be wasted • Implement a kerbside organic collection and processing service to generate biofertilisers and renewable energy from organic waste • Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington • Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery • Create a waste ecosystem that demands and influences the right behaviours for desired outcomes • Support the creation of markets for secondary materials.</p>	<p>Agree</p>
<p>Q15. Do you have further comments on Objective 3 and/or the related suggested priority options?</p>	<p>See attached supporting document.</p>
<p>Q16. Do you support or oppose Objective 4? Waste that cannot be avoided, reduced, reused, or recycled is managed safely – we aim to treat waste infrastructure built today as a finite resource and carefully manage it.</p>	<p>Strongly support</p>
<p>Q17. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 4. The suggested priority actions are: • Manage the treatment and disposal of sludge • Provide for and manage emergency waste • Ongoing management of the Southern landfill to support Wellington’s transition to a zero waste city • Work with partners and stakeholders to scale up interventions to recover and divert as much waste from landfill and ensure that any remaining waste is appropriately managed at Southern Landfill to protect our environment.</p>	<p>Agree</p>
<p>Q18. Do you have further comments on Objective 4 and/or the related suggested priority actions?</p>	<p>See attached supporting document.</p>

Q19. Do you have any other comments to make on the overall direction of the Zero Waste Strategy? not answered

Q20. Please attach any additional documents/information to support your submission.





He anamata para kore mō Pōneke - A zero waste future for Wellington

Supporting document to consultation submission from Waste Free Welly

Waste Free Welly is an open and collaborative group of individuals, enterprises, advocates, educators, researchers, NGOs, and consultants, working to progress the vision of zero waste in the Wellington Region. Members of Waste Free Welly include: [Sustainability Trust](#), [Zero Waste Network Aotearoa](#), [The Rubbish Trip](#), [Nonstop Solutions](#), [Kaicycle Urban Farm and Composting](#), [Para Kore](#), and many more.

We welcome this Strategy that will guide future waste planning and actions for our capital city. We fully support the council's commitment to a zero waste future for Wellington and want to work with the Council to ensure the ambition is realised. We have provided detailed responses to the Council's consultation questions in the document below and welcome continued engagement as strategy and action plan is finalised and moves into implementation.

NB We have not included specific question number referencing as the numbering differs between the online and written submission template. We have also included a link to our template submission text as an additional supporting document; this document was made publicly available to support others in our community wanting to make a response to the consultation. [You can find this here](#)

Any other comments about the overall direction of the Zero Waste Strategy

In General

We support the Zero Waste Strategy and believe it is a positive step because it:

1. Strengthens the relationship between council and mana whenua
2. Commits to engaging, empowering and involving communities and developing partnership opportunities with community stakeholders
3. Recognises the connection between waste reduction, emissions reduction and wellbeing
4. Aligns action to reduce waste with key Council policy
5. Uses the waste hierarchy to prioritise action
6. Builds the Zero Waste Programme into the Council structure to support WMMP implementation and ensure budget allocation
7. Acknowledges the need to change production and consumption systems, products, materials and business models
8. Makes it clear that incineration is not part of the city's strategic vision for waste.

Community Outcomes

We agree that changing the councils focus from managing waste to preventing waste will make an important contribution to achieving the four community outcomes. It would be helpful to have a table that makes this connection clearer in the final strategy document. This will make it easy to show how proposed actions and spending will help achieve goals that are valued by the community. It will also make it easier for decision makers to make the case for investments and policy changes that support implementation. We have included an example table below.

Community Outcome	Implementation of the Zero Waste Strategy helps achieve this by:
<p>Environment A sustainable, climate friendly eco capital A city where the natural environment is being preserved, biodiversity is improved, natural resources are used sustainably and the city is mitigating and adapting to climate change - for now and future generations.</p>	<ul style="list-style-type: none"> ● Slowing down extraction of raw materials protects biodiversity and ecosystems ● Making and transporting less reduces emissions ● Better management of hazardous products reduces harm to people and ecosystems ● Reducing leakage of plastics and other products into the environment ● Regeneration of natural systems is built into responsible production and consumption processes ● Risks addressed in the present rather than pushed onto future generations
<p>Social A people friendly compact safe and accessible city An inclusive, liveable and</p>	<ul style="list-style-type: none"> ● Zero waste services are accessible ● People have access to the knowledge and support they need to change behaviour ● Communities and whānau are cohesive,

<p>resilient city where people and communities can learn, are connected, well housed, safe and healthy.</p>	<p>engaged and empowered</p> <ul style="list-style-type: none"> ● Resources (food, materials, products) are available for those who need them where they need them ● Local facilities become community hubs providing spaces for different parts of our community to engage ● Providing access to low cost goods
<p>Cultural An innovative, inclusive and creative city Wellington is a vibrant, creative city with the energy and opportunity to connect, collaborate, explore identities and openly express, preserve and enjoy arts, culture and heritage.</p>	<ul style="list-style-type: none"> ● Identity of the city is aligned with zero waste and circular principles ● Innovation around service delivery, engagement and behaviour change ● Engagement in new ways of being through the arts to inspire shift to zero waste lifestyles ● Diverse range of organisations collaborating to bring the circular economy to life ● Hospitality and events sector showcases good practice ● Better user experience
<p>Economic A dynamic and sustainable economy The city is attracting and developing creative talent to enterprises across the city, creating jobs through innovation and growth while working towards an environmentally sustainable future.</p>	<ul style="list-style-type: none"> ● Wellington is a leader in sustainable practise ● Brand and reputation of city is aligned with 2040 vision and strategic direction of travel ● Supports development of innovative business models and products ● Increased diversity of local supply market ● Enabling circular economy ecosystem ● Cost and risk managed in the present rather than deferred to future generations ● Providing opportunities for local economic development - new service models ● New career pathways ● Attracting new investment

Tūpiki ora

We support the use of the Tūpiki Ora principles to **integrate a te ao Māori** led understanding of wellbeing into the zero waste strategy.

We support the value of whakapapa, as a relevant frame for thinking about how to implement practical circular economy and zero waste strategies.

We would like to see a specific priority action included under Objectives 1, 2 and 3 to **create economic development opportunities for Māori**. This would help to integrate the commitment made on p 48-49 to work in partnership with mana whenua and Māori under:

- **Pito mata** - potential for opportunities and growth
- **Mana ōrite** - looking for partnership opportunities
- **Te auaha** - develop new creative and innovative models, innovate and experiment.

Delivery Partnerships

The strategy document does a good job of clearly connecting the zero waste strategy with the **Economic Wellbeing Strategy** via circular economy principles: designing out waste and pollution, keeping products and materials in circulation for as long as possible and regenerating nature. Waste is a consequence of the ways we use our production and consumption systems to meet our wants and needs. Making this connection is a critical enabler for effective action to reduce waste at source.

The working approach, that drops out of the relationship between mana whenua and councils described in Tūpiki Ora, makes a strong commitment to work with a wider range of delivery partners. Council will: *“Engage with, empower and involve our community in changing behaviour and solutions”*.

Under the **Mana ōrite** principle council commits to looking for partnership opportunities with mana whenua and all community stakeholders who have a keen interest in the protection of our natural environment and minimisation of waste.

Under **Te auaha** principle Council commits to providing opportunities, through the delivery of the Zero Waste Programme, for local partners to experiment and innovate to create and deliver effective services and systems.

Partnership opportunities

There are a number of existing and emerging opportunities for council to work in partnership with organisations who are committed to embedding zero waste and circular economy across the city. We are aware of many local enterprises and organisations who are keen to work alongside the council as delivery partners. The strategy creates a better framework for enabling these kinds of partnerships.

Developing a diverse supply market for services is a key strategy for increasing resilience in case of emergency and across time. New models for procurement will be required to enable this. The strategy signals that this is a priority in the economics and finance workstream. A new model for shifting from trials to service delivery contracts needs to be developed so Council has a suitable mechanism for working with organisations at the small to medium scale.

Purpose driven business which includes Māori, community and social enterprise as well as SME - uses a different model for service delivery which focuses on impact and the users experience. They tend to embed services into communities rather than doing things for / or to communities. Their benefits often run across several council priorities/objectives/teams so the Zero Waste Strategy, which references that integrated role of waste reduction, community development, economic development, environmental protection and climate change response, will enable consideration of these co-benefits alongside cost of provision.

Key areas of interest include:

1. development of the reuse economy,
2. small to medium scale organics solutions,
3. local resource recovery services through zero waste hubs and events
4. behaviour change and community engagement.

Smaller entities and innovative approaches can help the council fill service provision gaps and establish new social norms for example: quick wins to take advantage of current opportunities, pilot and trial new concepts, meet needs of groups that can't be serviced using standard methodologies, combine community engagement with service provision through customer focused services, reach communities that have been overlooked.

Examples of aligned enterprises include: Hopper Refill, Reusabowl, Washing Up Welly, Nonstop Solutions, GoodFor, Mevo, Switched On bikes. The Sustainability Expo held at Parliament in 2022 showcased how much is already happening in the city.

Priorities include:

Understanding the baseline

- Supporting a mapping project to identify current activity and enterprises working in the zero waste and circular economy space.
- Identifying opportunities to develop reusables market
- Supporting the "washing up welly" project to service events, hospitality, grocery, retail and supply lines

Promotion and Comms support

- Joint marketing and comms to showcase current action being taken eg. battery recycling include non council sites in promotion and comms

Access to zero waste hubs

- Support a city centre zero waste hub - make the case and implement a pop up trial
- Identify at least one other site for a zero waste hub which could focus on timber to align with work in progress in the region
- Support Repair programmes like Repair-Ed
- Identify and implement network approach to zero waste hubs so tip shop and other sites are able to work collectively for mutual benefit

Diverse supply market for Composting

- pilot and expand small / medium sized community composting (build on current Kai Cycle Trial)
- Specific project to identify suitable sites for different methodologies and reduce barriers to entry
- Create strong connections between composting, gardening and food resilience

Maximise diversion at existing facilities

- upgrade user experience at Southern landfill Transfer station site so it is easy for users to divert more

Access to recycling for MUD's

- Identify sites and introduce recycling collection spots for MUDS - glass, paper, cardboard.

Support enabling agencies and intermediaries like Waste Free Welly

- To work with grassroots organisations and build support networks so they can do more

- Value the time of operators equally to that of consultants - valuable information, ideas and insights flow from the coal face.
- Share knowledge and experience across silos - council, community, business - to build skills, capacity and capability

Expand the range of community engagement and behaviour change programmes

- Contracts and support for local organisations to engage with communities
- Link with national projects and programmes to deliver at the local level
- Increase support for Para Kore

Enforcing compliance to create willingness to pay for services

- Create and use bylaws to create an expectation of change from BAU. This is starting to drive change in the events space.

Principles

We **support the principles**, they are a positive step forward and give clarity to the Council's direction on zero waste.

Priority Actions

We recommend a review of all the priority actions to ensure they are aligned with the principles and that the principles are reviewed against our language and terminology recommendations.

The priority actions as they stand are a good start but would be strengthened if reviewed and tightened up for the final version

Key Points:

- Language is used inconsistently - eg. 'waste' used as a catch all descriptor in all 4 objectives
- More consistent approach to phrasing - some are simple actions, others aspirational statements and outcomes
- Similar priority actions have different phrasing in different objectives but it is not clear why
- More focused statements that show how the action will apply to the particular objective - some are very general and high level
- Some key actions like behaviour change don't have a priority action in each objective
- Financial and economic actions need to appear against all four objectives

Language and definitions

Language, terminology and imagery/icons should be used more carefully and consistently to accurately describe activities at each layer of the waste hierarchy and reflect circular economy principles.

We think the Strategy should **include a glossary of key terms at the front**, and then the wording throughout the document should be amended to align with the glossary, so that the right words are used at the right time.

There is a good definition of Zero Waste on p 10. It would be useful to elevate this by including it in a glossary so it is clear this is the baseline for the strategy.

At the moment:

- Key concepts, like labels from the waste hierarchy or phrases like “sharing economy” and “reuse economy”, are not always used consistently, correctly or completely.
- Images don’t always reflect the content of the accompanying text (e.g. a recycling bin icon used to depict both waste and recycling).
- Waste management’ is used in many different contexts, but fits best in Objective 4
- “Regeneration” is loosely used in relation to the processing of materials and resources (i.e. “recycling” or “composting”), rather than to reference regenerating nature.
- “Repurposing” and “reuse” are used interchangeably, when they are different concepts.

Behaviour change

To achieve the targets people and organisations will need to make some big changes in the ways they do things. Behaviour change is a critical enabler that needs to be woven through the strategy in a more integrated and comprehensive way. Empowering people and organisations to reduce waste requires a combination of structural change, mindset shifts, knowledge sharing and confidence building as well as an identity shift.

Behaviour change is in the background text of the document but it needs to shine through as a key theme. This is in line with the councils stated intent on p49 *2. To engage with , empower and involve our community in changing behaviour and solutions.* The following changes and additions would strengthen the behaviour change theme in the Zero Waste Strategy and make it easier to carry through into implementation phases.

Weave it through by:

Ch 1 Why we need a zero waste strategy?

Include the shift in awareness and attitudes by the public and across supply chains that is driving change in legislation, regulation, business practice and behaviour. This underpins and precedes a lot of the work being done in the policy, regulation and legislation spaces.

This shift is reflected in WCC’s recognition of the need for a strong and rapid response to the Climate and Ecological Emergency which is driving change through the Councils plans, policies and implementation systems.

Ch 3 Strategic context

Include a specific section that references:

- changes in public opinion over time e.g. Kantar [Better Futures survey](#) 2022 results and

- the action being taken by businesses who understand the need to secure social licence to retain and expand their customer bases.

This helps set the scene for the objectives and priority actions that focus on behaviour change. (The current section on Increasing convenience is too narrowly focused on plastic to include this broader perspective.)

It is important to recognise that people are more than 'consumers' and service users. They are able to play active roles at all the layers in the waste hierarchy. Action at the top of the waste hierarchy which prevents waste is more about lifestyle change, identity shifts and business model change than 'consumption' which relates more to choosing between alternative products that have already been created.

People also play multiple roles in their daily lives: residents are also workers, business owners, decision makers, volunteers, community event organisers etc. Acknowledging and leveraging these overlaps is a key strategy for driving change up the waste hierarchy. The "public" are a complex mix of those leading the way and those that need support to make the shift towards zero waste.

The surge in interest and commitment to action around climate change due to the impact of recent weather events shows how quickly perceptions can shift. Framing people up as active citizens who can and do create change, engage others, make things happen and bring the city's zero waste vision to life in the strategy document sets the scene for new action and acknowledges the value of the work that is already being done in this space.

Ch 4 A zero waste future for Wellington

All 4 objectives and all four objectives contain a large behaviour change component. This needs to be made more explicit in the text describing each objective and the Priority actions. The idea of an ecosystem approach to behaviour change needs to be fleshed out. The current text has a mix of framing - sometimes top down "*making people understand*" and "*informing people*" and "*helping people*" other times recognising that working with and empowering people requires an inclusive and enabling approach.

P64 header ***provide information so residents know what to do*** is too narrow and needs to be expanded into a wider behaviour change approach. Something like "Support residents to live zero waste lifestyles". This section is very council focused and scope needs to be expanded to encompass organisations other than council working in the behaviour change space, engagement and education being delivered as part of customer service alongside eg at resource recovery centres and events.

Behaviour change needs to be culturally appropriate so it is a good fit with the community being engaged with. It is important that council supports and enables organisations to engage directly with their own communities of place, and of interest so that support, encouragement and key messages are delivered in ways that can be more easily received and responded to.

Behaviour change needs to be embedded in infrastructure and systems so that everyone using services has the advice and support they need to do the right thing. Broader behaviour change campaigns and engagement programmes need to sit alongside practical services so

that everyone becomes aware of the why and to secure willingness to pay for new services. This applies to services across the board from reuse to disposal facilities.

Strategy format and approach

We believe the strategy as written will be hard for most Wellingtonians to engage and connect with:

- A **summary strategy** is needed for wider communication once adopted.
- **Stronger storytelling** about the **circular economy ecosystem** would help everyone buy into their part in making this strategy happen.

Roles and responsibilities

The **roles and responsibilities of all the players in the system** and the relationships between them need to be expanded, with a reduced emphasis on individual responsibility and increased emphasis on collective responsibility.

The strategy currently details the roles and responsibilities the Council itself and of residents and but provides disproportionately less detail on the proactive roles that business and other forms of enterprise and organisation can play (e.g. p.24)

We accept that residents are able to use their purchasing power to influence the kinds of products and services that are available. Residents are also able to act outside of the 'consumer' role as evidenced by the emerging trend towards zero waste lifestyles.

However their consumption choices are constrained due to access and affordability. This also applies to most small to medium enterprises who depend on supply chains to put suitable products on the shelves and to provide services that support zero waste lifestyles and circular business models.

The text in the businesses section focuses on end of life waste. Businesses and organisations also have a key role to play in the top half of the waste hierarchy.

Shifting to business models that support durability, repair, reusables and sharing systems is a critical lever in the transition to a more circular economy. Increasing recycling and composting of unavoidable waste is a necessary element of this but slowing down flows of products and materials requires action further up the waste hierarchy.

Circularity needs to be built in from the top of the supply chain so that it cascades down to smaller business and household customers. Redesigning business models and products underpins the zero waste lifestyle shifts that can be made by customers and enables supply chain partners to become more circular.

Business creates opportunities for others by putting products on the shelves and offering services that enable customers and supply chains to make decisions aligned with the waste hierarchy. This also helps create a zero waste culture for visitors and residents. Positive feedback loops are created when people's lived experience aligns with their desire to live more sustainable lifestyles.

Purpose driven businesses and enterprises are driving innovation by offering new kinds of

products and services that enable zero waste lifestyles. They often combine engagement and service delivery to support people to change their behaviour. Community, social and Māori enterprises may work on the margins of the economy to provide services that are valuable but not offered by traditional commercial operators.

Organisations and households have a key role to play in appropriately disposing of hazardous products and chemicals as well as eliminating litter and other forms of 'leakage' of waste into our environment.

The section on Waste Operators only seems to reference rubbish handling. It would be useful to expand this to include recycling, composting and other forms of resource recovery if the intention is to encompass the whole sector.

Zero Waste Programme

The outline of the zero waste programme (on p. 76) includes the large scale projects that the Council is currently working on, but not how future work will be integrated. Throughout the document, there is also very little recognition of the various circular initiatives that already exist in the city. We would like to see the final version of the strategy amended to include:

- Clarification of how space will be made for the new and emerging projects, activities and initiatives identified through the WMMP and action plan development process (the diagram on p.47 reads as though the Zero Waste Programme just aims to create an action plan and WMMP document).
- Clarification of the scale of the impact projects/programmes will deliver against the targets, their relationship to the objectives and a timeline for implementation.
- Identification of the circular, zero waste initiatives that already exist in the city and how these could be scaled up or worked with to help Council to achieve its objectives more quickly. For example, existing sharing/service-based businesses, reuse and repair initiatives, compost service providers and community-based resource recovery initiatives (if understanding of these initiatives is lacking, then a mapping and stocktake exercise should be included in the Priority Actions of Objectives 1, 2 and 3).

Objective 1: Products and services provided in Wellington are waste free - we aim to avoid unnecessary waste and design waste out. Do you have further comments on Objective 1 and/or related suggested priority actions?

We support this ambitious objective, focused on preventing waste by supporting businesses to design waste out of the system through new products and services.

The second clause of this objective would be stronger if it read: "We aim to avoid unnecessary waste and design **out** waste **and pollution**." This would better align with circular

economy principles and enable work to reduce leakage of products, chemicals and materials into the environment.

The supporting commentary on pages 56-59 of the document needs strengthening to live up to the objective. The commentary could paint a clearer picture of what Objective 1 really means and how it will be achieved. It could **draw the link between waste prevention and emissions reduction**, and the connection between this objective and Council's wider climate strategies.

As written, the commentary mostly describes diversion activities (i.e. what we do with waste once it has already been created), rather than waste-free systems. It should be rewritten to focus on **waste prevention, reduction and reuse practices**, to match up with the objective. These practices are about moving away from single-use, disposable and short-life products, towards sharing/library business models, durable products, and reuse systems.

Priority actions for Council to make this shift happen can include **adopting bylaws and investing in infrastructure and systems** that help the city's businesses to normalise reusable packaging systems, or that increase and make the best use of product/service sharing systems, like Mevo, laundromats, and libraries.

Another action Council can take is to **commit to walk the talk** in its own practices, and embed waste-free, sharing and reuse-based purchasing and behaviours at Council and its own events, venues and facilities.

Rethinking the economic models that underpin funding, financing, partnership and procurement is a critical task for Council to achieve and properly budget and resource Objective 1 and We would like to see this included in the list of priority actions.

Objective 2: Waste reduction is made attractive and accessible to Wellingtonians - We aim to make it convenient for residents, businesses and consumers to recycle their waste. Do you have further comments on Objective 2 and/or related suggested priority actions?

We support the intent of this objective to make waste reduction services accessible and attractive. The commentary focuses on waste reduction across the waste hierarchy, including activities like repair, which is great. For consistency and clarity, **the second clause of the objective should be reworded** to say: "we aim to make it convenient for residents, businesses and consumers to **reduce recycle** their waste".

The commentary's focus should be about **how to make low-waste living easier and more accessible for Wellingtonians**. This includes making it easier for people to 'do the right thing' and recycle and repair more items, and also making it easier to buy goods without packaging, and to consume less.

Consuming less includes **being able to access items when you need them, without having to buy and own one (or buy new)**. We are pleased to see recognition that access to the sharing economy is enabled by libraries and rental services. The sharing economy could receive more attention in the commentary and we recommend some clarity around what the Council thinks it can do to support these services to exist. It's great that the strategy recognises the value of the secondhand economy for reducing waste and consumption too.

The document references **the reuse economy**, which is great, but limits the definition to the traditional secondhand market. The reuse economy is much broader than this and includes product delivery models that reduce single-use, such as reusable packaging and serviceware systems, like grocery refilleries. The strategy document could outline how these opportunities for low-waste purchasing will be increased so that living a low-waste lifestyle is easier and more convenient for Wellingtonians. Also, the strategy document often uses the terms "reuse" and "repurpose" interchangeably, but these are different concepts and should be used more carefully (reusing is more circular and efficient because it keeps products performing the same or similar purpose with each reuse cycle, whereas repurposing puts products to a different purpose than what they were originally made for).

We are heartened to see the strong commitment to **actively support developing reuse and repair services**. More of these services will help Wellingtonians to keep the products they own in circulation for as long as possible. We are pleased that both local community repair hubs and commercial repair services are included in the scope of initiatives Council can support.

Convenient access to drop-off locations to recycle a wider range of products is important. We are pleased that the council has suggested **establishing a network of resource recovery facilities**, and **partnering with community and social enterprises** to deliver this; these organisations are deeply connected to local communities and are well-placed to develop the network with a user-centred design focus. Wellington's emerging resource recovery network is already undertaking **activities across the waste hierarchy**, and contains many innovative models for co-locating reduce, reuse, repair and compost activities, delivering services, engaging communities, and supporting behaviour change. Council's strategy could support more of this.

Objective 3: Infrastructure and systems to increase resource circularity are established - We aim to recover and process materials to regain value from resources. Do you have further comments on Objective 3 and/or the related suggested priority options?

We support the intent of this objective to grow the infrastructure and systems needed to increase reuse, recycling and composting in Wellington.

To better connect this objective with the overarching strategy of zero waste, some crucial words should be added to this objective so that it says: "The infrastructure and systems to **reduce consumption and** increase resource circularity **are in place are established** – we

aim to **decrease virgin material use and** recover and process **products and** materials to **keep resources in circulation for as long as possible.** (Then delete this bit *regain value from resources.*)

We suggest rewording the outcome for this section to better align with circular economy principles. In the outcome and some other places in the strategy document 'regeneration' is used as a proxy for 'recycling'. In the circular economy framework **regeneration is applied to nature, not resources.**

In circular economy thinking regeneration applies to the natural systems and ecosystems that underpin both society and the economy. A circular economy is one where production processes are fundamentally regenerative, improving the quality of soils, water, ecosystems (and societies) so they are sustainable in the long term.

Current linear practices tend to be extractive and polluting so they degrade environmental quality over time as externalities are not factored in. Sustainable Development Goal #12 aims to shift towards more responsible production and consumption systems in which actively improving environmental quality is business as usual.

We also suggest replacing the term "**repurposed**" with more precise and commonly understood terms, such as "**reused**", "**recycled**" and "**composted**". For example: "In Wellington, products are shared and reused, materials are recycled and composted, and our surrounding environment is regenerated."

We agree that separate collection and processing of **organic material** is a priority for reducing both waste and emissions from landfill, but the strategy suggests a single large facility can meet all needs. This approach is out of step with other parts of the strategy, which aim to build supplier diversity and capability. **Diversity in collection and processing options** enables servicing of user groups with specific requirements (e.g MUDS), creates opportunities for innovation, creates different products to suit particular markets and builds system resilience.

Food waste volumes collected, composted and processed can be expanded by reaching beyond the standardised kerbside service delivery mechanism. We believe the Council should **build on successful examples** already present in the city, many of which have received Council funding, like Capital Compost, Kaicycle, Why Waste, and composting hubs at community gardens and City Housing complexes. Including and expanding these models also aligns with the Strategy's **Proximity Principle** by keeping organic materials circulating as locally as possible.

We **strongly support** the strong commitment to reducing waste from the **construction and demolition sector** including exploring deconstruction and a mandatory requirement to sort and separate at class 2 to 4 landfills.

Source separation is a key strategy for increasing diversion to reuse, recycling and reprocessing for all materials and products. Any new collection and processing systems must be fit for purpose to deliver the high quality input streams reprocessors and secondhand markets require.

In the **short term** it would be useful and cost effective to focus on simple, quick win ways to divert more materials from landfill, alongside implementation of longer term solutions. Improving the user experience at existing facilities (such as at the Southern Landfill), building small and medium sized organics processing capacity and expanding collection and drop-off locations.

We support the focus on **regulatory tools and compliance, monitoring and enforcement**. Enforcement is a critical mechanism for establishing and maintaining a clear bottom line.

Objective 4: Waste that cannot be avoided, reduced, reused, or recycled is managed safely - We aim to treat waste infrastructure built today as a finite resource and carefully manage it. Do you have further comments on Objective 4 and/or the related suggested priority actions?

We support the intent of this objective to ensure **safe disposal of waste**. We are also encouraged to see the Southern Landfill's constraint on capacity being used to motivate a change in approach by Council, residents, businesses and other organisations. This 'identity shift' where Wellington City sees itself as a place where zero waste strategies are valued and landfill space preserved as long as possible, will drive change through the system.

We suggest **clearer language surrounding the landfill lifespan** to reflect the intent, such as: "We ~~will aim to~~ treat waste infrastructure today as a finite resource and carefully manage it, **working to preserve its capacity and lifespan as long as possible.**"

We think that the objective should consider a wider harm lens, to look beyond landfills and to encompass mitigation of the waste that escapes waste management systems. This includes: clarifying the process for safe management of **hazardous material** including chemicals requiring treatment/disposal; clearly restating the rationale provided in the opening context pages of the Strategy for rejecting **incineration** as a safe disposal method (including the emissions consequences); and including actions to mitigate 'leakage' by plastics, microplastics, chemicals and other products and materials into the environment, as well as litter and illegal disposal.

We strongly support action to address the **cleanfill gaps** by putting in place infrastructure, but also by reducing waste at source. There is a big risk of increased illegal disposal of waste, as well as use of capacity at the Southern Landfill if this is not addressed in the short term.

As recent weather events in Aotearoa have shown, resilience and safe disposal is about more than just landfills. We think the priority actions should reflect that a network of waste reduction, diversion and processing infrastructure is needed to **spread the risk and reduce vulnerability**.

We suggest adding the following wording to the Objective to reflect these issues: 'Waste that cannot be avoided, reduced, reused, or recycled is managed safely and **without harm or leakage to the environment**'.

Do you have any comments and ideas in relation to the targets of the Zero Waste Strategy? (included in the printed submission template)

We support the **ambitious targets**, and are pleased to see organics being included. Our expectation is that the targets apply to **all waste from the city**, and not just Council managed waste. The strategy should provide further context so it is clear how the targets are defined.

We want to see **clear accountability** from the Council for delivery with a robust framework for tracking progress on the Strategy. Most of the priority actions are not specific, so without visibility of the full action plan it is not clear how assessing progress against these in the 18 month review will be possible. We believe the strategy does not include all the measures, indicators and targets required to track progress.

The focus for the targets is on lag indicators that are measurable after material has been diverted. It is common to include lead indicators in measurement systems which show the work being done to influence behaviour, change the system, establish facilities which will generate waste reduction over time. This gives all the stakeholders confidence that progress is being made and that the prerequisites are in place to achieve the targets.

We recommend the Council makes the timeline for implementation publically available and that the Strategy includes priority actions to:

- Establish and measure progress indicators to track interim progress towards the targets and outcomes
- Develop a platform with a timeline that can regularly share data/insights on progress with Wellingtonians to create a transparent feedback loop
- Include indicators that track attitude and behaviour change over time.

Reducing waste at source has a significant impact on emissions reduction as well as avoiding upstream and downstream impacts on biodiversity and ecosystems. Reducing emissions and material/product use supports the council's **Climate and Ecological emergency response**. We would like some indicators that show this contribution built into reporting on the zero waste strategy. This could be a paste of indicators already being used or developed for Te Atakura or may require new indicators that track the city's consumption emissions or material flow index.

We would like to see a clearer description of how the **requirement for a 4 to 1 ratio of rubbish** to sludge will be managed as this is a critical limitation for achieving the targets.

This includes identifying actions that could be taken prior to the Sludge Minimisation Facility becoming operational. The long lead time for the sludge project means a rapid drop in waste will be required between 2027 and 2030.

In the meantime investments should be made in system changes that will future proof our ability to achieve a rapid drop in waste from 2026 e.g.

- priority waste streams that are small in volume but high impact, like electronic waste, need to be separated and diverted
- infrastructure and ecosystem development to shift from single-use to reusable packaging
- small to medium scale interventions for composting and organics collections that provide services to users that fall outside the standard kerbside delivery models
- behaviour change programmes that engage communities, businesses and households so momentum builds up ahead of 2026.

We prepared a summary of key points for Waste Free Welly members to use as a base for their own submissions

A copy of this is available here as a pdf

for https://drive.google.com/file/d/1CBGF5-hA2K6ZAewfP4DyAHJlyor1op85/view?usp=share_link



Wellington City Council is [consulting on a proposed Zero Waste Strategy called *He anamata para kore mō Pōneke - A zero waste future for Wellington*](#). The Strategy will guide future waste planning and actions for our capital city.

You have an opportunity to [have your say](#) until **Tuesday 28 February 2023, 5pm**.

This document is a guide to make it quick and easy to make a submission. It has been created by **Waste Free Welly** - an open and collaborative group of individuals, enterprises, advocates, educators, researchers, NGOs and consultants, working to progress the vision of zero waste in the Wellington Region.

About the Strategy and this submission guide

The Council's Zero Waste Strategy proposes **Four Objectives**, each with their own list of **Priority Actions** and a desired **Outcome**. The Strategy also proposes five overarching **Zero Waste Targets**.

The Council's public consultation questions are built around the strategy's proposed **objectives** and **targets**. So, this submission guide follows that structure. For each question or set of questions, we set out in a **blue box** the key parts of the Strategy that you need to know before you write your answer. Directly under each blue box, we give some template answer ideas.

The question numbering and format is different depending on whether you submit online or using the printed submission form. We've given the number referencing for both submissions.

Ready? Let's begin!

Printed submission (Questions 1 - 7) / Online submission (Questions 1-3) are for your personal details

Fill these out as appropriate to you.

Printed submission Q8 / Online submission - Q4 is about how much clarity the strategy gives on the Council's direction on zero waste

Printed Q8 / Online Q4 (tick box) - **strongly agree**

Printed submission Qs 9 - 11 / Online submission Qs 5 - 7 are about Objective 1

Objective 1: Products and services provided in Wellington are waste free - we aim to avoid unnecessary waste and design waste out

Outcome: Wellington moves towards a circular economy

Priority actions:

- Deliver the benefits of reuse and waste prevention through active use of Council regulations, compliance activities and enforcement
- Deliver lasting behaviour change interventions by making people understand the benefits of change and then help them make that long term change easy
- Work with partners and stakeholders to empower individuals to have courage to make a change in the world by inspiring individuals to reduce waste and live a more sustainable life
- Work with Central Government agencies to shape policy decisions that can be developed into actions that prevent waste
- Transform Wellingtonians relationship with packaging
- Work with Mana Whenua, partners and stakeholders to support the redesign of systems, including changing design and production, creating new markets for reuse

and recycling and inspiring Wellingtonians to cut waste, save resources and reduce Greenhouse Gas emissions

- Encourage businesses, social enterprise and charities to create local and regional markets for waste materials

Read more at pages 56-59 of proposed strategy document

Template answers (feel free to tweak to what works for you)

Printed Q9 / Online Q5 (tick box): **Strongly support**

Printed Q10 / Online Q6 (tick box): **Agree**

Printed Q11 / Online Q7 (free text): ***“Do you have further comments on Objective 1 and/or related suggested priority actions?”***

I/we support this ambitious objective, focused on preventing waste by supporting businesses to design waste out of the system through new products and services.

The supporting commentary on pages 56-59 of the document needs strengthening to live up to the objective. The commentary could paint a clearer picture of what Objective 1 really means and how it will be achieved. It could **draw the link between waste prevention and emissions reduction**, and the connection between this objective and Council’s wider climate strategies.

As written, the commentary mostly describes diversion activities (i.e. what we do with waste once it has already been created), rather than waste-free systems. It should be rewritten to focus on **waste prevention, reduction and reuse practices**, to match up with the objective. These practices are about moving away from single-use, disposable and short-life products, towards sharing/library business models, durable products, and reuse systems.

Priority actions for Council to make this shift happen can include **adopting bylaws and investing in infrastructure and systems** that help the city’s businesses to normalise reusable packaging systems, or that increase and make the best use of product/service sharing systems, like Mevo, laundromats, and libraries.

Another action Council can take is to **commit to walk the talk** in its own practices, and embed waste-free, sharing and reuse-based purchasing and behaviours at Council and its own events, venues and facilities.

Rethinking the economic models that underpin funding, financing, partnership and procurement is a critical task for Council to achieve and properly budget and resource Objective 1 and I/We would like to see this included in the list of priority actions.

**Printed submission Qs 12 - 14 / Online submission
Qs 8 - 10 are about Objective 2**

Objective 2: Waste reduction is made attractive and accessible to Wellingtonians - We aim to make it convenient for residents, businesses and consumers to recycle their waste.

Outcome: The community is equipped to reduce waste

Priority actions:

- Delivery of consistent, equitable and accessible waste collections
- Manage funds and revenues to support Wellington's reuse, re-purpose and recycling capacity by creating a catalyst for other investment
- Deliver value for money and sustainable waste services to Wellingtonians
- Innovation encouraged to support delivery of Wellington's transition to a zero waste future
- Monitoring and evaluation of waste arisings (salvage of secondary or waste products) to support effective policy making and insights
- Deliver lasting behaviour change interventions by making people understand the benefits of change and then helping them make that long term change easy
- Work with Central Government agencies to inform and shape system changes
- Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington
- Increase the amount of material that is recovered, reused and recycled to minimise waste and reduce the amount of virgin materials used in production
- Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery

Read more at pages 60-64 of proposed strategy document

Template answers (feel free to tweak to what works for you)

Printed Q12 / Online Q8 (tick box): **Support**

Printed Q13 / Online Q9 (tick box): **Agree**

Printed Q14 / Online Q10 (free text): ***“Do you have further comments on Objective 2 and/or related suggested priority actions?”***

I/we support the intent of this objective to make waste reduction services accessible and attractive. The commentary focuses on waste reduction across the waste hierarchy, including activities like repair, which is great. For consistency and clarity, **the second clause of the objective should be reworded** to say: “we aim to make it convenient for residents, businesses and consumers to **reduce recycle** their waste”.

The commentary’s focus should be about **how to make low-waste living easier and more accessible for Wellingtonians**. This includes making it easier for people to ‘do the right thing’ and recycle and repair more items, and also making it easier to buy goods without packaging, and to consume less.

Consuming less includes **being able to access items when you need them, without having to buy and own one (or buy new)**. I/we are pleased to see recognition that access to the sharing economy is enabled by libraries and rental services. The sharing economy could receive more attention in the commentary and we recommend some clarity around what the Council thinks it can do to support these services to exist. It’s great that the strategy recognises the value of the secondhand economy for reducing waste and consumption too.

The document references **the reuse economy**, which is great, but limits the definition to the traditional secondhand market. The reuse economy is much broader than this and includes product delivery models that reduce single-use, such as reusable packaging and serveware systems, like grocery refilleries. The strategy document could outline how these opportunities for low-waste purchasing will be increased so that living a low-waste lifestyle is easier and more convenient for Wellingtonians. Also, the strategy document often uses the terms “reuse” and “repurpose” interchangeably, but these are different concepts and should be used more carefully (reusing is more circular and efficient because it keeps products performing the same or similar purpose with each reuse cycle, whereas repurposing puts products to a different purpose than what they were originally made for).

I/we are heartened to see the strong commitment to **actively support developing reuse and repair services**. More of these services will help Wellingtonians to keep the products they own in circulation for as long as possible. I/we are pleased that both local community repair hubs and commercial repair services are included in the scope of initiatives Council can support.

Convenient access to drop-off locations to recycle a wider range of products is important. I/we are pleased that the council has suggested **establishing a network of resource recovery facilities**, and **partnering with community and social enterprises** to deliver this; these organisations are deeply connected to local communities and are well-placed to develop the network with a user-centred design focus. Wellington's emerging resource recovery network is already undertaking **activities across the waste hierarchy**, and contains many innovative models for co-locating reduce, reuse, repair and compost activities, delivering services, engaging communities, and supporting behaviour change. Council's strategy could support more of this.

Printed Qs 15 - 17 / Online Qs 11 - 13 are about Objective 3

Objective 3: Infrastructure and systems to increase resource circularity are established - We aim to recover and process materials to regain value from resources

Outcome: Resources are repurposed and regenerated in Wellington

Priority actions:

- Support the provision of consistent, equitable and accessible kerbside waste collections for Wellingtonians
- Work together with households, producers, collectors and reprocessors to extract the maximum value possible from food that would otherwise be wasted
- Implement a kerbside organic collection and processing service to generate bio-fertilisers and renewable energy from organic waste
- Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington
- Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery
- Create a waste ecosystem that demands and influences the right behaviours for desired outcomes
- Support the creation of markets for secondary materials

Read more at pages 66-69 of proposed strategy document

Template answers (feel free to tweak to what works for you)

Printed Q15 / Online Q11 (tick box): **Support**

Printed Q16 / Online Q12 (tick box): **Agree**

Printed Q17/ Online Q13 (free text): ***“Do you have further comments on Objective 3 and/or the related suggested priority options?”***

I/we support the intent of this objective to grow the infrastructure and systems needed to increase reuse, recycling and composting in Wellington.

To better connect this objective with the overarching strategy of zero waste, some crucial words should be added to this objective so that it says: “The infrastructure and systems to **reduce consumption and** increase resource circularity **is in place** ~~are established~~ – we aim to **decrease virgin material use and** recover and process materials to regain value from resources.”

I/we suggest rewording the outcome for this section to better align with circular economy principles. I/we are pleased to see the concept of regeneration in the strategy, but this should be an overarching aim for the environment to be regenerated. In the circular economy framework **regeneration is applied to nature, not resources**. I/we also suggest replacing the term “**repurposed**” with more precise and commonly understood terms, such as “**reused**”, “**recycled**” and “**composted**”. For example: “In Wellington, products are shared and reused, materials are recycled and composted, and our surrounding environment is regenerated.”

I/we agree that separate collection and processing of **organic material** is a priority for reducing both waste and emissions from landfill, but the strategy suggests a single large facility can meet all needs. This approach is out of step with other parts of the strategy, which aim to build supplier diversity and capability. **Diversity in collection and processing options** enables servicing of user groups with specific requirements (e.g MUDS), creates opportunities for innovation, creates different products to suit particular markets and builds system resilience.

Food waste volumes collected, composted and processed can be expanded by reaching beyond the standardised kerbside service delivery mechanism. I/we believe the Council should **build on successful examples** already present in the city, many of which have received Council funding, like Capital Compost, Kaicycle, Why Waste, and composting hubs at community gardens and City Housing complexes. Including and expanding these models also aligns with the Strategy’s **Proximity Principle** by keeping organic materials circulating as locally as possible.

I/we **strongly support** the strong commitment to reducing waste from the **construction and demolition sector** including exploring deconstruction and a mandatory requirement to sort and separate at class 2 to 4 landfills.

Source separation is a key strategy for increasing diversion to reuse, recycling and reprocessing for all materials and products. Any new collection and processing systems must be fit for purpose to deliver the high quality input streams reprocessors and secondhand markets require.

In the **short term** it would be useful and cost effective to focus on simple, quick win ways to divert more materials from landfill, alongside implementation of longer term solutions. Improving the user experience at existing facilities (such as at the Southern Landfill), building small and medium sized organics processing capacity and expanding collection and drop-off locations.

I/we support the focus on **regulatory tools and compliance, monitoring and enforcement**. Enforcement is a critical mechanism for establishing and maintaining a clear bottom line.

Printed Qs 18 - 20 / Online Qs 14 - 16 are about Objective 4

Objective 4: Waste that cannot be avoided, reduced, reused, or recycled is managed safely - We aim to treat waste infrastructure built today as a finite resource and carefully manage it

Outcome: Landfill capacity is treated as a finite resource

Priority actions:

- Manage the treatment and disposal of sludge
- Provide for and manage emergency waste
- Ongoing management of the Southern landfill to support Wellington's transition to a zero waste city.
- Work with partners and stakeholders to scale up interventions to recover and divert as much waste from landfill and ensure that any remaining waste is appropriately managed at Southern Landfill to protect our environment

Read more at pages 70-72 of proposed strategy document

Template answers (feel free to tweak to what works for you)

Printed Q18 / Online Q14 (tick box): **Strongly support**

Printed Q19 /Online Q15 (tick box): **Agree**

Printed Q20 / Online Q16 (free text): ***“Do you have further comments on Objective 4 and/or the related suggested priority actions?”***

I/we support the intent of this objective to ensure **safe disposal of waste**. I/we are also encouraged to see the Southern Landfill's constraint on capacity being used to motivate a change in approach by Council, residents, businesses and other organisations. This 'identity shift' where Wellington City sees itself as a place where zero waste strategies are valued and landfill space preserved as long as possible, will drive change through the system. I/we suggest **clearer language surrounding the landfill lifespan** to reflect the intent, such as: "We **will aim to** treat waste infrastructure today as a finite resource and carefully manage it, **working to preserve its capacity and lifespan as long as possible.**"

I/we think that the objective should consider a wider harm lens, to look beyond landfills and to encompass mitigation of the waste that escapes waste management systems. This includes: clarifying the process for safe management of **hazardous material** including chemicals requiring treatment/disposal; clearly restating the rationale provided in the opening context pages of the Strategy for rejecting **incineration** as a safe disposal method (including the emissions consequences); and including actions to **mitigate 'leakage' by plastics**, microplastics, chemicals and other products and materials into the environment, as well as litter and illegal disposal.

I/we strongly support action to address the **cleanfill gaps** by putting in place infrastructure, but also by reducing waste at source. There is a big risk of increased illegal disposal of waste, as well as use of capacity at the Southern Landfill if this is not addressed in the short term.

As recent weather events in Aotearoa have shown, resilience and safe disposal is about more than just landfills. I/we think the priority actions should reflect that a network of waste reduction, diversion and processing infrastructure is needed to **spread the risk and reduce vulnerability**.

I/we suggest adding the following wording to the Objective to reflect these issues: 'Waste that cannot be avoided, reduced, reused, or recycled is managed safely and **without harm or leakage to the environment**'.

Printed Q21 is about the zero waste targets

The Strategy proposes **five** zero waste targets (*see pages 5 and 75 of the document*):

1. Reduce per capita kerbside waste by **40% by 2030**.
2. Reduce total waste to landfill by **50% by 2030**.
3. Reduce biogenic methane gas emissions by at least **30% by 2035**.
4. Divert **50%** of construction and demolition waste from landfill **by 2030; 70% by 2035**.
5. Divert **50-70%** of organic waste from landfill **by 2030**.

This question only appears in the printed submission form - if you are filling out the online submission form, we suggest including any thoughts you have on targets into your answer to Q17 of the online submission form (below) that asks for other comments.

Template answer (feel free to tweak to what works for you)

Printed Q21 (free text):

I/we support the **ambitious targets**, and are pleased to see organics being included. Our expectation is that the targets apply to **all waste from the city**, and not just Council managed waste. The strategy should provide further context so it is clear how the targets are defined.

I/we want to see **clear accountability** from the Council for delivery with a robust framework for tracking progress on the Strategy. Most of the priority actions are not specific, so without visibility of the full action plan it is not clear how assessing progress against these in the 18 month review will be possible. I/we believe the strategy does not include all the measures, indicators and targets required to track progress. I/we recommend the Council makes a timeline for implementation publically available and that the Strategy includes priority actions to:

- Establish and measure progress indicators to track interim progress towards the targets and outcomes
- Develop a platform with a timeline that can regularly share data/insights on progress with Wellingtonians to create a transparent feedback loop

Reducing waste at source has a significant impact on emissions reduction as well as avoiding upstream and downstream impacts on biodiversity and ecosystems. Reducing emissions and material/product use supports the council's **Climate and Ecological emergency response**. I/We would like some indicators that show this contribution built into reporting on the zero waste strategy. This could be a paste of indicators already being used or developed for Te Atakura or may require new indicators that track the city's consumption emissions or material flow index.

I/we would like to see a clearer description of how the **requirement for a 4 to 1 ratio of rubbish** to sludge will be managed as it is a critical limitation for achieving the targets. This includes identifying actions that could be taken prior to the Sludge Minimisation Facility becoming operational. The long lead time for the sludge project means a rapid drop in waste will be required between 2027 and 2030. In the meantime, priority waste streams that are small in

volume but high impact, like electronic waste, need to be separated and diverted, and investments should be made in system changes (e.g. shifting from single-use to reusable packaging) to future-proof our ability to achieve a rapid drop in waste from 2026.

Online Q17 gives space for any other comments about the overall direction of the Zero Waste Strategy

This question only appears in the online submission form - if you are completing the printed submission, we suggest including any of the comments below that you agree with into your answer to Q21 of the printed submission form on targets (above).

Template answer (feel free to tweak to what works for you)

Online Q17 (free text): *“Do you have any other comments to make on the overall direction of the Zero Waste Strategy?”*

I/We fully support the council’s commitment to a zero waste future for Wellington.

I/we support the Zero Waste strategy and believe it is a positive step because it:

1. Strengthens the relationship between council and mana whenua
2. Commits to engaging, empowering and involving communities and developing partnership opportunities with community stakeholders
3. Recognises the connection between waste reduction, emissions reduction and wellbeing
4. Aligns action to reduce waste with key Council policy
5. Uses the waste hierarchy to prioritise action
Builds the Zero Waste Programme into the Council structure to support WMMP implementation and ensure budget allocation
6. Acknowledges the need to change production and consumption systems, products, materials and business models
7. Makes it clear that incineration is not part of the city’s strategic vision for waste.

I/we support the use of the Tūpiki Ora principles to **integrate a te ao Māori** led understanding of wellbeing into the zero waste strategy. I/We support the value of whakapapa, as a relevant frame for thinking about how to implement practical circular economy and zero waste strategies.

I/We would like to see inclusion of a specific priority action under Objectives 1, 2 and 3 to **create economic development opportunities for Māori**. This would help to integrate the commitment made on p 48-49 to work in partnership with mana whenua and Māori under:

- **Pito mata** - potential for opportunities and growth
- **Mana ōrite** - looking for partnership opportunities

- **Te auaha** - develop new creative and innovative models, innovate and experiment.

The strategy document does a good job of clearly connecting the zero waste strategy with the **Economic Wellbeing Strategy** via circular economy principles: designing out waste and pollution, keeping products and materials in circulation for as long as possible and regenerating nature. Waste is a consequence of the ways we use our production and consumption systems to meet our wants and needs. Making this connection is a critical enabler for effective action to reduce waste at source.

I/we **support the principles**, they are a positive step forward and give clarity to the Council's direction on zero waste. I/we recommend a review of all the priority actions to ensure they are aligned with the principles and that the principles are reviewed against our language and terminology recommendations.

Language, terminology and imagery/icons should be used more carefully and consistently to accurately describe activities at each layer of the waste hierarchy and reflect circular economy principles. I/We think the Strategy should **include a glossary of key terms at the front**, and then the wording throughout the document should be amended to align with the glossary, so that the right words are used at the right time. At the moment:

- Key concepts, like labels from the waste hierarchy or phrases like “sharing economy” and “reuse economy”, are not always used consistently, correctly or completely.
- Images don't always reflect the content of the accompanying text (e.g. a recycling bin icon used to depict both waste and recycling).
- Waste management' is used in many different contexts, but fits best in Objective 4
- “Regeneration” is loosely used in relation to the processing of materials and resources (i.e. “recycling” or “composting”), rather than to reference regenerating nature.
- “Repurposing” and “reuse” are used interchangeably, when they are different concepts.


Behaviour change is a critical enabler. I/we would like to see **behaviour change** woven through the strategy in a more integrated and more comprehensive way. Empowering people and organisations to reduce waste requires a combination of structural change, mindset shifts, knowledge sharing and confidence building as well as an identity shift.

I/we believe the strategy as written will be hard for most Wellingtonians to engage and connect with:

- A **summary strategy** is needed for wider communication once adopted.
- **Stronger storytelling** about the **circular economy ecosystem** would help everyone buy into their part in making this strategy happen.
- The **roles and responsibilities of all the players in the system** and the relationships between them need to be expanded, with a reduced emphasis on individual responsibility and increased emphasis on collective responsibility. The strategy currently details the roles and responsibilities of residents and the Council itself, but provides disproportionately less detail on the proactive roles that business and other forms of enterprise and organisation can play (e.g. p.24).

The outline of the zero waste programme (on p. 76) includes the large scale projects that the Council is currently working on, but not how future work will be integrated. Throughout the document, there is also very little recognition of the various circular initiatives that already exist in the city. I/We would like to see the final version of the strategy amended to include:

- Clarification of how space will be made for the new and emerging projects, activities and initiatives identified through the WMMP and action plan development process (the diagram on p.47 reads as though the Zero Waste Programme just aims to create an action plan and WMMP document).
- Clarification of the scale of the impact projects/programmes will deliver against the targets, their relationship to the objectives and a timeline for implementation.
- Identification of the circular, zero waste initiatives that already exist in the city and how these could be scaled up or worked with to help Council to achieve its objectives more quickly. For example, existing sharing/service-based businesses, reuse and repair initiatives, compost service providers and community-based resource recovery initiatives (if understanding of these initiatives is lacking, then a mapping and stocktake exercise should be included in the Priority Actions of Objectives 1, 2 and 3).

	Respondent No: 1	Responded At: Mar 02, 2023 09:56:52 am
	Login: [REDACTED]	Last Seen: [REDACTED]
	Email: [REDACTED]	IP Address: [REDACTED]

- Q1. Are you making a submission as an individual or organisation? Organisation
-
- Q2. Name not answered
-
- Q3. Name of organisation Friends of Owhiro Stream (FOOS)
-
- Q4. Would you like to make a public oral submission? Yes
-
- Q5. Please fill in your email address/contact details so we can contact you to organise an oral submission [REDACTED]
-
- Q6. How much do you agree or disagree with the following statement: The strategy provides clarity on council's direction for reducing waste? Agree
-
- Q7. Do you support or oppose Objective 1? Products and services provided in Wellington are waste free – we aim to avoid unnecessary resource use and to design waste out Strongly support
-

<p>Q8. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 1.</p> <p>The suggested priority actions are: • Deliver the benefits of reuse and waste prevention through active use of Council regulations, compliance activities and enforcement • Deliver lasting behaviour change interventions by making people understand the benefits of change and then help them make that long term change easy • Work with partners and stakeholders to empower individuals to have courage to make a change in the world by inspiring individuals to reduce waste and live a more sustainable life • Work with Central Government agencies to shape policy decisions that can be developed into actions that prevent waste • Transform Wellingtonians relationship with packaging • Work with Mana Whenua, partners and stakeholders to support the redesign of systems, including changing design and production, creating new markets for reuse and recycling and inspiring Wellingtonians to cut waste, save resources and reduce Greenhouse Gas emissions • Encourage businesses, social enterprise and charities to create local and regional markets for waste materials.</p>	Agree
<p>Q9. Do you have further comments on Objective 1 and/or related suggested priority actions?</p>	not answered
<p>Q10. Do you support or oppose Objective 2? Waste reduction is attractive and accessible to Wellingtonians – we aim to make it convenient for residents, businesses and consumers to recycle their waste.</p>	Support

Q11. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 2. The suggested priority actions are: • Delivery of consistent, equitable and accessible waste collections • Manage funds and revenues to support Wellington's reuse, re-purpose and recycling capacity by creating a catalyst for other investment • Deliver value for money and sustainable waste services to Wellingtonians • Innovation encouraged to support delivery of Wellington's transition to a zero-waste future • Monitoring and evaluation of waste arisings (salvage of secondary or waste products) to support effective policy making and insights • Deliver lasting behaviour change interventions by making people understand the benefits of change and then helping them make that long term change easy • Work with Central Government agencies to inform and shape system changes • Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington • Increase the amount of material that is recovered, reused and recycled to minimise waste and reduce the amount of virgin materials used in production • Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery.

Agree

Q12. Do you have further comments on Objective 2 and/or related suggested priority actions?

not answered

Q13. Do you support or oppose Objective 3? The infrastructure and systems to increase resource circularity are established – we aim to recover and process materials to regain value from resources.

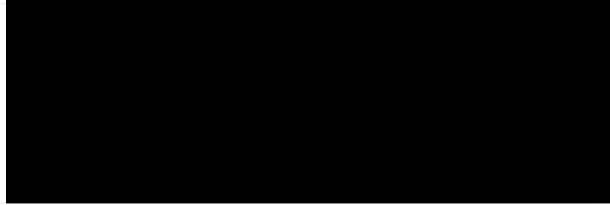
Support

<p>Q14. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 3. The suggested priority actions are: • Support the provision of consistent, equitable and accessible kerbside waste collections for Wellingtonians • Work together with households, producers, collectors and reprocessors to extract the maximum value possible from food that would otherwise be wasted • Implement a kerbside organic collection and processing service to generate biofertilisers and renewable energy from organic waste • Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington • Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery • Create a waste ecosystem that demands and influences the right behaviours for desired outcomes • Support the creation of markets for secondary materials.</p>	<p>Agree</p>
<p>Q15. Do you have further comments on Objective 3 and/or the related suggested priority options?</p>	<p>not answered</p>
<p>Q16. Do you support or oppose Objective 4? Waste that cannot be avoided, reduced, reused, or recycled is managed safely – we aim to treat waste infrastructure built today as a finite resource and carefully manage it.</p>	<p>Strongly support</p>
<p>Q17. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 4. The suggested priority actions are: • Manage the treatment and disposal of sludge • Provide for and manage emergency waste • Ongoing management of the Southern landfill to support Wellington’s transition to a zero waste city • Work with partners and stakeholders to scale up interventions to recover and divert as much waste from landfill and ensure that any remaining waste is appropriately managed at Southern Landfill to protect our environment.</p>	<p>Agree</p>
<p>Q18. Do you have further comments on Objective 4 and/or the related suggested priority actions?</p>	<p>not answered</p>

**Q19. Do you have any other comments to make on
the overall direction of the Zero Waste Strategy?**

see attachment

**Q20. Please attach any additional
documents/information to support your
submission.**





Respondent No: 80

Responded At: Feb 28, 2023 15:46:37 pm



Q1. Are you making a submission as an individual or organisation?	Organisation
Q2. Name	not answered
Q3. Name of organisation	Ōwhiro Bay Residents Association
Q4. Would you like to make a public oral submission?	Yes
Q5. Please fill in your email address/contact details so we can contact you to organise an oral submission	
Q6. How much do you agree or disagree with the following statement: The strategy provides clarity on council's direction for reducing waste?	Undecided
Q7. Do you support or oppose Objective 1? Products and services provided in Wellington are waste free – we aim to avoid unnecessary resource use and to design waste out	Undecided

Q8. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 1.

Undecided

The suggested priority actions are:

- Deliver the benefits of reuse and waste prevention through active use of Council regulations, compliance activities and enforcement
- Deliver lasting behaviour change interventions by making people understand the benefits of change and then help them make that long term change easy
- Work with partners and stakeholders to empower individuals to have courage to make a change in the world by inspiring individuals to reduce waste and live a more sustainable life
- Work with Central Government agencies to shape policy decisions that can be developed into actions that prevent waste
- Transform Wellingtonians relationship with packaging
- Work with Mana Whenua, partners and stakeholders to support the redesign of systems, including changing design and production, creating new markets for reuse and recycling and inspiring Wellingtonians to cut waste, save resources and reduce Greenhouse Gas emissions
- Encourage businesses, social enterprise and charities to create local and regional markets for waste materials.

Q9. Do you have further comments on Objective 1 and/or related suggested priority actions?

not answered

Q10. Do you support or oppose Objective 2? Waste reduction is attractive and accessible to Wellingtonians – we aim to make it convenient for residents, businesses and consumers to recycle their waste.

Undecided

Q11. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 2. The suggested priority actions are:

- Delivery of consistent, equitable and accessible waste collections
- Manage funds and revenues to support Wellington's reuse, re-purpose and recycling capacity by creating a catalyst for other investment
- Deliver value for money and sustainable waste services to Wellingtonians
- Innovation encouraged to support delivery of Wellington's transition to a zero-waste future
- Monitoring and evaluation of waste arisings (salvage of secondary or waste products) to support effective policy making and insights
- Deliver lasting behaviour change interventions by making people understand the benefits of change and then helping them make that long term change easy
- Work with Central Government agencies to inform and shape system changes
- Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington
- Increase the amount of material that is recovered, reused and recycled to minimise waste and reduce the amount of virgin materials used in production
- Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery.

Undecided

Q12. Do you have further comments on Objective 2 and/or related suggested priority actions?

not answered

Q13. Do you support or oppose Objective 3? The infrastructure and systems to increase resource circularity are established – we aim to recover and process materials to regain value from resources.

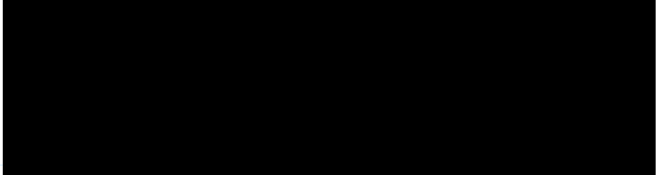
Undecided

Q14. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 3. The suggested priority actions are: • Support the provision of consistent, equitable and accessible kerbside waste collections for Wellingtonians • Work together with households, producers, collectors and reprocessors to extract the maximum value possible from food that would otherwise be wasted • Implement a kerbside organic collection and processing service to generate biofertilisers and renewable energy from organic waste • Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington • Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery • Create a waste ecosystem that demands and influences the right behaviours for desired outcomes • Support the creation of markets for secondary materials.	Undecided
Q15. Do you have further comments on Objective 3 and/or the related suggested priority options?	not answered
Q16. Do you support or oppose Objective 4? Waste that cannot be avoided, reduced, reused, or recycled is managed safely – we aim to treat waste infrastructure built today as a finite resource and carefully manage it.	Undecided
Q17. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 4. The suggested priority actions are: • Manage the treatment and disposal of sludge • Provide for and manage emergency waste • Ongoing management of the Southern landfill to support Wellington’s transition to a zero waste city • Work with partners and stakeholders to scale up interventions to recover and divert as much waste from landfill and ensure that any remaining waste is appropriately managed at Southern Landfill to protect our environment.	Undecided
Q18. Do you have further comments on Objective 4 and/or the related suggested priority actions?	not answered

Q19. Do you have any other comments to make on the overall direction of the Zero Waste Strategy?

not answered

Q20. Please attach any additional documents/information to support your submission.



Owhiro Bay Residents' Association (OBRA) Submission on WCC Waste Strategy 28-02-2023

This Strategy is generally pointing Wellington in the right direction and the objectives are laudable. We strongly support the message being given by the council about zero waste and its relationship with the circular economy.

A few points in general:

- it is a bit confusing as to which Objectives contain which activities and approaches – they seem to overlap.
- there is too much emphasis on what the council and residents should and can do rather than what businesses should be doing.
- on the online questionnaire there is only space for 255 characters for each Objective, which is obviously inadequate. Is this a mistake?
- I know the Action Plan will address the detail, but it would be good to see here something more specific re timelines and plans.

Objective 1: avoid and design out waste

We strongly support the council's statement that avoiding waste is at the top of the waste hierarchy. To take a purist view, all the other objectives are interim measures that, although essential, will support our journey towards this objective. However, this section does not concentrate enough on its stated aim and talks also about dealing with waste once created, which is covered under the subsequent Objectives. It could give more emphasis to such things as how container return schemes might work, banning plastic packaging and single-use plastics, mandating repairable products and compulsory long guarantee periods, and refitting of buildings rather than demolition.

Although we support the priority to *Transform Wellingtonians' relationship with packaging*, consumers cannot easily avoid packaging - there needs to be discussion on how Wellington retailers can be encouraged/pressured to reject packaging from imported products, and how bylaws and other regulations can be used.

The section entitled *Rethink Council's waste management practices* includes not just avoiding and designing out waste but many other reduction ideas.

Specifically,

The sludge being removed from landfill – does this really belong in this section? This change in sludge treatment is, in fact, in the reducing waste basket, and may in the future become reused.

The WCC **financial model** needs a basic change to support this new way of functioning; there could be an explanation on how this is expected to look in the next LTP.

The large end statement: *We will invest in system resilience to future proof our infrastructure for unexpected change* seems out of place. Does it fit in to Objective 1, and if so, where is the explanation of how this will be addressed?

Objective 2: waste reduction by domestic recycling

Is this just about residents recycling or about them reducing in other ways too?

The sharing economy is growing and it is great that the council wants to enable it. Enable and give grants and land or use of buildings to communities for siting composting, sharing sheds, produce boxes, repair hubs. We are finding it hard to get a sharing hub off the ground in our community.

The free economy is also flourishing – giving unwanted things away and picking them up on local websites or OpShops. The council could consider how to help this.

Helping the repair economy is a good action. But this puts the onus onto busy consumers to deal with faulty appliances and tools. To make waste reduction easier for Wellingtonians it would be fairer if the responsibility were put back where it belongs: on manufacturers via retailers. Inbuilt obsolescence policies need to be stamped out by encouraging retailers to demand long guarantees, repairable appliances and available spare parts.

Building codes to ensure new blocks of flats have a composter, and encourage designs that build in shareable areas, tools and washing machines.

We support the objective to *provide information so residents know what to do*. The WCC website needs to be improved and expanded. At the moment it is not easy to find out what to do with an item – where to take it for recycling or repair, what is open and when. It would make residents' lives much easier if all council and private recycle/reuse/repurpose/composting/collection etc. sites and services could be listed on and linked to this one site. Importantly, it needs to be kept up to date on a daily basis. Other information that should be on such a website is the tracking of waste reduction targets and timelines for new initiatives. Proclaiming how we are doing might keep Wellingtonians engaged.

Objective 3: recover and process materials

What does 'regenerative' mean in this context?

We are well overdue for a food scrap collection / composting service. Wellington is well behind other NZ cities such as Christchurch and Auckland and the rest of the developed world - filling up landfills with organic matter and causing emissions. There has been a trial in Miramar but we still do not have a plan, and apparently there is not going to be one for several years. This lack of urgency seems to be partly caused by the sewage sludge ratio which demands that we keep throwing food into the Southern Landfill until the Moa Point treatment plant is complete mid 2026.

Although not accepting that alternatives to food scraps can't be found for the 4:1 mixture, OBRA urges the council to have the food scrap collection service at least ready to run on day one of the pipes being turned off in 2026.

Objective 4: landfill

OBRA has a particular interest in the Southern Landfill, which is on our doorstep.

We are glad that the council has agreed that a) as from 2026 sludge will not be buried at the Southern landfill and b) the Southern Landfill will not be extended further than the Piggyback

extension currently planned. However, the residents nearby do not accept that the Southern Landfill should be kept open for as long as possible; this is not, for us, one of the benefits of reducing the city's waste. When stage 1 of the piggyback extension is operational it will have probably substantially more than 10 years' life and we are keen that the second stage should not be developed in the way currently planned. The decision on whether this takes place will hopefully be based on much better information about volumes and types of waste than we have now.

The estimate and plans for the Southern Landfill's future needs to be tightened up and it must be integrated into the Waste Action Plan. We do not yet have an adequate plan for either the waste disposal nor the composting, recycling and reuse activities at the site and we want to see this detail in the Action Plan.

There are two other landfills in the same area – the private landfills C&D and T&T. These are meant to accept only cleanfill and demolition waste. Over the years the regional and district councils have not been adequately monitoring these nor enforcing resource consent conditions. They have been allowed to pollute our stream/stormwater with leachate and land with flying soft plastics and have been a major source of heavy traffic through Brooklyn and Te Aro, often from out of town. If these are left to operate as at present they will continue encouraging waste and making no attempt to divert timber or useful building material from the tip. There must be much more stringent regulation, monitoring and enforcement to ensure this doesn't happen. Their – and other private tips' - management should be part of the Action Plan.

Include actions to mitigate 'leakage' by plastics, microplastics, chemicals and other products and materials into the environment, as well as litter and illegal disposal. The landfills - old and new - leak leachate, soft plastics and gases into the surroundings, which at the Southern Landfill includes a marine reserve, an SNA, the 'halo effect' area of native bird spread from Zealandia, nature reserve, recreational open space used by many residents and tourists, the only open stream in the city, the outer green belt and a regenerating corridor of native bush from city to sea.

It should be restated that landfills are the very last resort in a circular economy. We should concentrate on reducing waste at source. The speed of filling up the Southern Landfill cannot be managed by increasing dumping fees, although this is a useful strategy. Over a certain level this will just increase the illegal disposal of waste.

Resilience and safe disposal is about more than just landfills, and the Southern Landfill should be phased out: such a facility has no longer any place in a well-populated and scenic area of the city.. The priority actions should reflect that a network of waste reduction, diversion and processing infrastructure is needed to spread the risk and reduce vulnerability.

Targets

Why does the Online version not include this Question 21? It is important, and is the only place where anything specific is set down.

Much better information about volumes and types of waste is required than what we have now; if the council does not gather, monitor and analyse waste data in the most stringent way then it will


not have the power to make the most meaningful changes. We would like to know what is planned for such an exercise.

More specifically:

Divert 50-70% of organic waste from landfill by 2030. Does this organic waste include the sewage sludge turned off in 2026?

We would like to see a timeline for waste reduction, with tracking and progress indicators; hopefully this will be part of the Action Plan. Is it really not going to start until mid 2026 when the sludge requirement is no longer there? What can be done prior to that?

The Southern Landfill is a facility that should be included in the timeline. As waste is reduced to a minimum amount, there is good reason to keep the landfill open only for emergency resilience purposes, and possibly hazardous waste, and send all other residual amounts to a regional facility. Having a tip like this in the city and abutting conservation and recreational areas is an anachronism.

	Respondent No: 82	Responded At: Feb 28, 2023 16:41:37 pm
<div style="background-color: black; height: 30px; width: 100%;"></div>		
Q1. Are you making a submission as an individual or organisation?	Organisation	
Q2. Name	not answered	
Q3. Name of organisation	zero waste network Aotearoa	
Q4. Would you like to make a public oral submission?	Yes	
Q5. Please fill in your email address/contact details so we can contact you to organise an oral submission	<div style="background-color: black; height: 20px; width: 100%;"></div>	
Q6. How much do you agree or disagree with the following statement: The strategy provides clarity on council's direction for reducing waste?	Strongly Agree	
Q7. Do you support or oppose Objective 1? Products and services provided in Wellington are waste free – we aim to avoid unnecessary resource use and to design waste out	Strongly support	

<p>Q8. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 1.</p> <p>The suggested priority actions are: • Deliver the benefits of reuse and waste prevention through active use of Council regulations, compliance activities and enforcement • Deliver lasting behaviour change interventions by making people understand the benefits of change and then help them make that long term change easy • Work with partners and stakeholders to empower individuals to have courage to make a change in the world by inspiring individuals to reduce waste and live a more sustainable life • Work with Central Government agencies to shape policy decisions that can be developed into actions that prevent waste • Transform Wellingtonians relationship with packaging • Work with Mana Whenua, partners and stakeholders to support the redesign of systems, including changing design and production, creating new markets for reuse and recycling and inspiring Wellingtonians to cut waste, save resources and reduce Greenhouse Gas emissions • Encourage businesses, social enterprise and charities to create local and regional markets for waste materials.</p>	Agree
<p>Q9. Do you have further comments on Objective 1 and/or related suggested priority actions?</p>	see attached submission
<p>Q10. Do you support or oppose Objective 2? Waste reduction is attractive and accessible to Wellingtonians – we aim to make it convenient for residents, businesses and consumers to recycle their waste.</p>	Support

-
- Q11. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 2. The suggested priority actions are: • Delivery of consistent, equitable and accessible waste collections • Manage funds and revenues to support Wellington's reuse, re-purpose and recycling capacity by creating a catalyst for other investment • Deliver value for money and sustainable waste services to Wellingtonians • Innovation encouraged to support delivery of Wellington's transition to a zero-waste future • Monitoring and evaluation of waste arisings (salvage of secondary or waste products) to support effective policy making and insights • Deliver lasting behaviour change interventions by making people understand the benefits of change and then helping them make that long term change easy • Work with Central Government agencies to inform and shape system changes • Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington • Increase the amount of material that is recovered, reused and recycled to minimise waste and reduce the amount of virgin materials used in production • Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery.
- Agree
-
- Q12. Do you have further comments on Objective 2 and/or related suggested priority actions?
- see attached submission
-
- Q13. Do you support or oppose Objective 3? The infrastructure and systems to increase resource circularity are established – we aim to recover and process materials to regain value from resources.
- Support
-

<p>Q14. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 3. The suggested priority actions are: • Support the provision of consistent, equitable and accessible kerbside waste collections for Wellingtonians • Work together with households, producers, collectors and reprocessors to extract the maximum value possible from food that would otherwise be wasted • Implement a kerbside organic collection and processing service to generate biofertilisers and renewable energy from organic waste • Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington • Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery • Create a waste ecosystem that demands and influences the right behaviours for desired outcomes • Support the creation of markets for secondary materials.</p>	<p>Agree</p>
<p>Q15. Do you have further comments on Objective 3 and/or the related suggested priority options?</p>	<p>see attached submission</p>
<p>Q16. Do you support or oppose Objective 4? Waste that cannot be avoided, reduced, reused, or recycled is managed safely – we aim to treat waste infrastructure built today as a finite resource and carefully manage it.</p>	<p>Strongly support</p>
<p>Q17. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 4. The suggested priority actions are: • Manage the treatment and disposal of sludge • Provide for and manage emergency waste • Ongoing management of the Southern landfill to support Wellington’s transition to a zero waste city • Work with partners and stakeholders to scale up interventions to recover and divert as much waste from landfill and ensure that any remaining waste is appropriately managed at Southern Landfill to protect our environment.</p>	<p>Agree</p>
<p>Q18. Do you have further comments on Objective 4 and/or the related suggested priority actions?</p>	<p>see attached submission</p>

Q19. Do you have any other comments to make on the overall direction of the Zero Waste Strategy? see attached submission

Q20. Please attach any additional documents/information to support your submission.





Prepared for Zero Waste Network Aotearoa by Sue Coultts

Re: He anamata para kore mō Pōneke - A zero waste future for Wellington

Thank you for the opportunity to submit feedback on this Zero Waste Strategy.

We appreciate the hard work and collaborative effort that has gone into developing this new approach by Wellington City Council staff and councillors. We 100% support the use of zero waste strategies and circular economy principles to underpin the new direction of travel outlined in the strategy.

We look to Wellington as our capital city to lead the way into a zero waste, zero carbon future. It is encouraging to see the commitment that has been made across Council to accelerate this zero carbon and waste free transition. Connecting the dots between waste reduction and emissions reduction is a critical step.

A lot of good work and careful thought has gone into developing and writing this strategy document. We make the following comments and suggestions with the intention of supporting the work that has been done so far and strengthening the final version of the strategy.

We support the Waste Free Welly submission

Support the overall direction of travel

This zero waste strategy will help to drive change because it takes a more holistic, systems approach and addresses gaps and barriers to progress.

Ecosystem approach

Empowers communities, organisations and individuals to take action at the local scale
Embeds the Zero Waste Programme as an advocacy and implementation mechanism

Stronger relationships

Brings the relationship between Council and Mana Whenua to life through Tūpiki Ora
Develops partnership opportunities with a wider range of stakeholders

Strategic alignment

Connects the dots between waste reduction, emissions reduction and wellbeing
Aligns zero waste strategy to achieve core community outcomes and long term vision

New economic and financial models

Recognises new business and service models as the key to more responsible production and consumption across all sectors
Uses strategic procurement to catalyse innovation and support small to medium enterprises

Waste Hierarchy and circular economy principles

Uses the waste hierarchy to prioritise action and investment
Embeds circular economy principles to protect environment and reduce emissions
Takes incineration of mixed solid waste off the list of credible disposal options

Achieving Community Outcomes

Resources will be required to implement the strategy and some trade offs will need to be made.

We recommend including a table that shows how proposed actions and spending will help achieve the four outcomes that are valued by the community.

The table below gives an idea of what we mean. Our suggestions summarise many of the concepts and ideas already included in the strategy text. Having the key ideas in one place will make it easy for council staff and elected members to include them when building cases and creating council papers to support decision making.

Community Outcome	Implementation of the Zero Waste Strategy helps achieve this by:
<p>Environment A sustainable, climate friendly eco capital A city where the natural environment is being preserved, biodiversity is improved, natural resources are used sustainably and the city is mitigating and adapting to climate change - for now and future generations.</p>	<ul style="list-style-type: none"> ● Slowing down extraction of raw materials protects biodiversity and ecosystems ● Making and transporting less reduces emissions ● Better management of hazardous products reduces harm to people and ecosystems ● Reducing leakage of plastics and other products into the environment protects ecosystems ● Building regeneration of natural systems into responsible production and consumption practises ● Risks are addressed and reduced in the present rather than pushed onto future generations
<p>Social A people friendly compact safe and accessible city An inclusive, liveable and resilient city where people and communities can learn, are connected, well housed, safe and healthy.</p>	<ul style="list-style-type: none"> ● Zero waste services are accessible ● People have access to the knowledge and support they need to change behaviour ● Communities and whānau are cohesive, engaged and empowered ● Resources (food, materials, products) are available for those who need them where they need them ● Local facilities become community hubs providing spaces for different parts of our community to engage ● Providing access to low cost goods
<p>Cultural An innovative, inclusive and creative city Wellington is a vibrant, creative city with the energy and opportunity to connect, collaborate, explore identities and openly express, preserve and enjoy arts, culture and heritage.</p>	<ul style="list-style-type: none"> ● Identity of the city is aligned with zero waste and circular principles ● Innovation around service delivery, engagement and behaviour change ● Engagement in new ways of being through the arts to inspire shift to zero waste lifestyles ● Diverse range of organisations collaborating to bring the circular economy to life ● Hospitality and events sector showcases good practice ● Better, more satisfying user experience
<p>Economic A dynamic and sustainable economy The city is attracting and developing creative talent to enterprises across the city, creating jobs through innovation and growth while working towards an environmentally sustainable future.</p>	<ul style="list-style-type: none"> ● Wellington is a leader in sustainable practise ● Brand and reputation of city is aligned with 2040 vision and strategic direction of travel ● Supports development of innovative business models and products ● Increased diversity of local supply market ● Enabling circular economy ecosystem ● Cost and risk managed in the present rather than deferred to future generations ● Providing opportunities for local economic development - new service models ● New career pathways and capability building ● Attracts new investment and grows local economy

Tūpiki ora

We support the use of the Tūpiki Ora principles to integrate a te ao Māori led understanding of wellbeing into the zero waste strategy.

We support the value of whakapapa, as a relevant frame for thinking about how to implement practical circular economy and zero waste strategies.

We recommend including a specific priority action included under Objectives 1, 2 and 3 to create economic development opportunities for Māori.

This would help to integrate the commitment made on p 48-49 to work in partnership with mana whenua and Māori under:

- **Pito mata** - council recognises the potential for opportunities and growth, the need for widespread behaviour change and commits to pursuing opportunities that result in increased wellbeing for whānau
- **Mana ōrite** - council commits to looking for partnership opportunities with mana whenua, and all community stakeholders, who have a keen interest in the protection of our natural environment and minimisation of waste.
- **Te auaha** - Council commits to providing opportunities, through the delivery of the Zero Waste Programme, for local partners to experiment and innovate to create and deliver effective services and systems.

In this section p48-49 Council commits to: *“Engage with, empower and involve our community in changing behaviour and solutions”*. This is a significant shift from current practice and will involve all parties being willing to try new ways of working together in partnership to achieve shared goals and objectives.

We recommend making the priority actions relating to *working with stakeholders* more consistent so that mana whenua are included in all 4 of these action lines.

The Zero Waste Strategy uses circular economy principles to join the dots between waste reduction, emissions reduction and economic well being. Making this connection is a critical enabler for effective action to reduce waste at source. Waste is a consequence of the ways we use our production and consumption systems to meet our wants and needs. Waste is a sign of an inefficient and polluting economy.

Designing out waste and pollution, keeping products and materials in circulation for as long as possible and regenerating natural ecosystems, soil and water are fundamental building blocks in the business models of the circular enterprises emerging across the city.

Delivery partners

There are a number of existing and emerging opportunities for council to work in partnership with organisations who are committed to embedding zero waste and circular economy across the city. We are aware of many local enterprises and organisations who are keen to work alongside the council as delivery partners. The strategy creates a better framework for enabling these kinds of partnerships.

Developing a diverse supply market for services is a useful strategy for increasing resilience, in case of emergency and through time. It helps create a stronger and more stable local economy.

New models for procurement will be required to enable this. The strategy signals that this is a priority in the economics and finance workstream. A new model for shifting from trials to service delivery contracts needs to be developed so Council has a suitable mechanism for working with organisations at the small to medium scale.

Purpose driven business which includes Māori, community and social enterprise as well as SME - uses a different model for service delivery which focuses on impact and the users experience. They tend to embed services into communities rather than doing things for / or to communities.

Their benefits often run across several council priorities/objectives/teams so the Zero Waste Strategy, which references that integrated role of waste reduction, community development, economic development, environmental protection and climate change response, will enable consideration of these co-benefits alongside cost of provision.

Smaller entities and innovative approaches can help the council fill service provision gaps and establish new social norms for example:

- quick wins to take advantage of current opportunities
- pilot and trial new concepts
- meet needs of groups that can't be serviced using standard methodologies
- combine community engagement with service provision through customer focused services
- reach communities that have been overlooked.

We recommend the council invests in creating a more diverse supply market by partnering with local enterprises and organisations who are already working in this space so they can expand, develop and grow their impact.

See the Waste Free Welly submission for more detail on the local operators and opportunities.

Principles

We support the use of the 6 principles to clarify the direction of travel and shape decision making.

Priority Actions

The priority actions as they stand are a good start but would be strengthened if reviewed and tightened up for the final version

We noticed that:

- Language is used inconsistently eg. 'waste' used as a catch all descriptor in all 4 objectives
- More consistent approach to phrasing - some are simple actions, others aspirational statements and outcomes
- Some are very general and high level - useful to include more focused statements that show how the action will apply to the particular objective
- Some key actions like behaviour change don't have a priority action in each objective

We recommend considering the detailed suggestions for wording of Priority Actions in the table at the end of this submission. Also includes suggestions to fill gaps.

Language and definitions

Language, terminology and imagery/icons should be used more carefully and consistently to accurately describe activities at each layer of the waste hierarchy and reflect circular economy principles. These are new concepts for many people and it is useful to have a shared language so everyone is on the same page. (See Waste Free Welly Submission for detailed points on content.)

We recommend including a glossary of key terms so that the wording in the strategy and other council documents is clear and consistent.

Behaviour change

For Wellington to be a leader in this space the whole city needs to get onboard, so that zero waste and circular practice become 'just what we do around here'. To achieve the targets people and organisations will need to make some big changes in the ways they do things.

Empowering people and organisations to reduce waste requires a combination of structural change, mindset shifts, knowledge sharing and confidence building as well as an identity shift.

The strategy makes a good start on creating an identity for the city which normalises zero waste and circular activity, gives people opportunities to make that part of their daily life and links it to solving big global problems like climate change, emissions reduction and economic well being.

Behaviour change is a critical enabler that needs to be woven through the strategy in a more integrated and comprehensive way. It needs to shine through as a key theme. This is in line with

the councils stated intent on p49 2. *To engage with , empower and involve our community in changing behaviour and solutions.*

We recommend strengthening the following points in the strategy document to make it easier to justify budget allocation and implementation:

- Acknowledging shifts in public opinion and business practice that precede and underpin the work being done in policy, regulation and legislation.
- Recognising the value of ‘active citizenship’ as a driver of change. People are more than consumers of goods and services, they play many roles each day at home, at work and out in the world and are proactive agents of change.
- Bringing the city’s zero waste vision to life will take everybody so new models of engagement that embed delivery into communities of place and interest will be required. Top down education and information sharing will not be enough.
- The approach needs to be inclusive and enabling rather than “telling” or “making”. Diverse channels and voices will be necessary to get cut through.
- Engagement, education and service provision can go hand in hand and be woven into practical activities at facilities and drop off points - people are receptive to learning new things when they have a problem they want to solve.
- More clearly flag the commitment to allocating budget and investing in this work in the priority actions

See Waste Free Welly submission for more detailed comments on this.

Roles and responsibilities

A systems approach is needed to achieve the zero waste vision and targets. The strategy needs to frame up a more interconnected and complex picture of the players in the landscape. Some of the roles and responsibilities are detailed in the document: council, mana whenua, residents. Others less so.

The waste operators section only covers the bottom of the hierarchy, other players in the resource recovery system are not acknowledged. The business section needs to take a wider view of enterprise and include purpose driven organisations like Māori, community and social enterprise and other community based organisations that create events and activities. It also needs to highlight the ways business/enterprise can contribute using the same headers as the residents section. Government is a big player in the city so should be included as a contributor of waste and a consumer.

A specific reference to roles for mana whenua and Māori could be included in the strategic context section on collective ownership of the waste problem p 22-24 - this is covered in p 48-49 but good to have all the players acknowledged in one place.

We recommend fleshing out the section on roles and responsibilities to include a bit more detail on what each group can contribute to achieving the strategy vision and objectives and creating a graphic that emphasises the interconnected nature of the parts of the system.

(See Waste Free Welly submission for more detail on this.)

Objectives

Comments on Objective 1

We support the intent of this objective

The second clause of this objective would be stronger if it read: “We aim to avoid unnecessary waste and design out waste and pollution.” This would better align with circular economy principles and enable work to reduce leakage of products, chemicals and materials into the environment to address harm. This also relates to businesses eg. shift from single use packaging to reusables reduces litter etc.

The link between reducing material and product flows and reducing emissions needs to be more clearly drawn. Consumption emissions are acknowledged in the text but it would be good to include an action to work with the climate change team to develop a better understanding of how the zero waste strategy implementation will reduce emissions across the board. This will be useful for council, business, other organisations and residents. The targets only relate to methane emissions so won't pull through work on upstream consumption emissions.

The “waste management” language is more relevant to work under objective 4. The earlier objectives need to use words that apply to activities up the waste hierarchy so that this kind of thinking becomes normalised. “Sustainable waste management” is an oxymoron, waste management is by definition unsustainable.

The text needs to have a stronger emphasis on prevention, reduction and reuse to focus on how the city can make the shift away from single-use, disposable and short-life products, towards sharing/library business models, durable products, and reuse systems. Government needs to be included as a discrete sector which could change practices in its own facilities.

It is good to see the section on economics, investment, funding and finance this is a critical enabler. Council is an anchor institution that can use its procurement and in house practice to enable and model zero waste and circular action. We agree that increasing community market capability, identifying new mechanisms for funding and financing and outcomes focused procurement will enable effective partnerships and investments

We recommend including a priority action to investigate and create new mechanisms for funding and financing that support the implementation of the strategy.

We recommend resetting the frame for Wellingtonians to ‘enable Wellingtonians to live zero waste lifestyles’ rather than making conscious consumer choices which is just one small part of this. This is a better fit with the priority actions for obj. 1 around lasting behaviour change interventions and empowering individuals.

Comments on Objective 2

We support the intent of this objective

We suggest rewording the second statement to read “we aim to make it convenient for residents, businesses and consumers to **reduce** their waste”.

It is good to see the focus on keeping products and materials in circulation for as long as possible using strategies like repair, reuse and sharing. The repair and reuse section focuses on the second hand market and repair services which is one key aspect. The reuse economy is a bigger concept which incorporates reusables and sharing models for providing goods and services.

This objective could be strengthened by expanding the section on facilities and events to encompass the city wide hospitality and events sector. With a clear story line about how reusables will replace single use disposables become the norm across the city’s venues and facilities. The council facilities are part of this but not the whole story. The story about sharing equipment, vehicles, books, tools and other products also needs to be expanded to show how this supports the shift to zero waste and circular practices.

We recommend expanding the commentary around reusables, how this relates to facilities, events and venues and the development of sharing models which create new ways to access goods and services.

This is probably a better fit in Obj. 1 and would give a more concrete set of actions to the ‘designing out’ objective.

The word “regenerate” is used in a confusing way. In circular economy thinking it applies to regeneration of natural systems - soil, water, ecosystems, biodiversity etc. In the text it is used to describe reusing and recycling materials. This needs to be tidied up. Reuse and repurpose are used interchangeably but mean different things: reuse for the same purpose which is usually more circular, repurpose to do a different job which may be a short hop from the landfill.

We support the strategies outlined but it is not clear how the strategies described in the commentary and in the “Our approach” sections. It feels like this header needs to move back before the “standardise provision in our own facilities” section so all four are included.

The strategies described in this section make sense but the focus is on what the council will do. It would be good to include descriptions of how other delivery partners will be included and

enabled. The section briefly mentions establishing a network of resource recovery facilities and partnering with community and social enterprises to deliver outreach programmes but it does not carry this through into Our approach sections.

We recommend spelling out the role that delivery partners can and do play in repair, reuse, resource recovery and behaviour change as well as how the council will support and enable these relationships. It is mentioned in Obj 1 but needs to be carried through into practical examples in later objectives.

This would bring the council's commitment to *"Engage with, empower and involve our community in changing behaviour and solutions"* to life. It would also create a practical link up with the priority action to *"work with partners and stakeholders to scale up interventions...."*

(see earlier points relating to delivery partners, Tūpiki Ora, economic well being and commitment and Waste Free Welly submission which details opportunities to work with community and SME partners.)

Comments on Objective 3

We support the intent of this objective

See comments under objective 2 about the use of regeneration and repurposing terminology. (See Waste Free Welly submission for more detail on this)

The sub header for this objective could be reworded

*"We aim to recover and process **products and materials** to **preserve the value of resources.**"*

The outcome for this objective needs to be reworded to bring it into line with circular economy principles. We suggest:

*"Resources are **kept in circulation for as long as possible.**"*

We recommend spelling out the role of other players in service delivery, especially small to medium operators who are able to supply services that complement large centralised facilities. This includes organics, construction and demolition and other resource recovery services.

See earlier section on delivery partners and Waste Free Welly Submission for detail on this

It makes sense for the *Our Approach* label to sit above Invest in construction and demolition facilities on p68 so these sections are included

We recommend specifically referencing source separation as a key strategy for increasing diversion to reuse, recycling and reprocessing for all materials and products. Any new collection and processing systems must be fit for purpose to deliver the high quality input streams reprocessors and secondhand markets require.

See Waste Free Welly submission for more detail on this objective

Comments on Objective 4

We support the intent to ensure safe disposal of waste and it is good to see the Council's commitment to using the capacity constraint as a driver to shift to zero waste strategies and develop a circular economy. We agree that ensuring suitable facilities for cleanfill is a priority.

We recommend

Adapting the wording of the objective to strengthen this commitment

Composted needs to be included in the header on p70

"Waste that cannot be avoided, reduced, reused, recycled or composted is managed safely without harm or leakage into the environment."

Clarify intention around preserving landfill void space in the sub header

"We will treat waste infrastructure built today as a finite resource and carefully manage it, to preserve its capacity and lifespan as long as possible."

Clarifying the story about hazardous waste

There is a gap in the story and the priority actions around consideration of harm including some forms of hazardous material as written p70-71 it sounds like all the hazardous material goes into the landfill. It would be good to have a few lines talking about what strategies are used to manage hazardous material that goes offsite.

Referencing leakage

It would be good to include a paragraph on leakage into the environment to cover off litter and other products and materials that are not captured in any collection system.

Committing to a clear position on Incineration

It is important to clearly state the council's position on incineration of mixed solid waste under this objective so it is locked in. At the moment this sits in the strategic context section and it needs to be embedded in Objective 4.

See Waste Free Welly submission for more detail on this objective

Targets

We support the use of clear and ambitious targets.

It is not clear from the documents exactly how the targets will be defined or measured.

Our expectation is that they apply to all waste in the city, not just that being handled through councils services and facilities.

The critical limiting factor is the 4:1 sludge ratio - modelling needs to be included to show how this relates to target timelines as the sludge project has a long lead time.

The key things for us are

- Accountability - how will this be tracked?
- Progress indicators - lead as well as lag - to show action taken that is expected to drive change. Needs to be an indicator tracking attitudinal and behaviour change.
- Timelines that show key milestones
- Modelling to show how actions will lead to achievement of targets
- Links to consumption emissions reduction which may come through from Climate team

See Waste Free Welly Submission for more detail on Targets

Priority actions detailed table on following pages

Suggestions for adapting Priority Actions as described in submission text (Organised into categories to help us think more clearly about the content rather than to be carried into the document) Original Priority Actions black, suggestions for changes red, suggestions for removal blue				
Intent	Objective 1 Prevention, Reusables	Objective 2 Reuse, prepare for reuse	Objective 3 Recycling, composting	Objective 4 Disposal
Organics	Work together with producers and households to prevent food waste at source	Work together with households, producers, collectors and reproducers to extract the maximum value possible from food that would otherwise be wasted	Implement a kerbside organic collection and organics processing services Leave out to generate bio-fertilisers and renewable energy from organic waste	Divert organics at disposal facilities
C, M+E	Active use of Council regulations, compliance activities and enforcement to support behaviour and system change			
Service delivery		Support the provision of consistent, equitable and accessible collection services, drop off points and community zero waste hubs	Support the provision of consistent, equitable and accessible kerbside recycling, organics and waste collections	Investigate, facilitate, support or provide clean fill services and facilities

		Was just waste collection focus	Leave out for Wellingtonians Recover products and materials so that they can be reused throughout Wellington	
Innovation in delivery	Support and encourage Innovation to enable Wellingtons transition to a zero waste future	Support and encourage businesses, social enterprise and charities to provide services and create local and regional markets for waste products and materials	Support the creation of markets, services and facilities for construction and demolition and other secondary materials	Ongoing management of the Southern landfill to support Wellington’s transition to a zero waste city
Money	Create and use new approaches to funding and financing to enable a more diverse supply market	Support Wellington’s reuse, repair, recycling and composting capacity by acting as a catalyst for other investment	Manage funds and revenues to deliver value for money and effective waste reduction services to Wellingtonians	
Behaviour change	Work with Mana Whenua, partners and stakeholders to deliver lasting behaviour change interventions that empower and inspire Wellingtonians to reduce waste and leakage into the environment	Work with Mana Whenua, partners and stakeholders to encourage, support and enable Wellingtonians to access and use reuse, repair and sharing services Leave out	Work with Mana Whenua, partners and stakeholders to encourage, support and enable Wellingtonians to access and use recycling and composting services Promote and encourage the reuse of products and	Provide advice, support and information at disposal facilities to increase diversion

	<p>Work with Mana Whenua, partners and stakeholders to transform Wellingtonians relationship with packaging and reusables</p> <p>Leave out to have courage to make a change in the world by inspiring individuals to reduce waste and live a more sustainable life</p> <p>Leave out Deliver lasting behaviour change interventions by making people understand the benefits of change and then help them make that long term change easy</p>	<p>Deliver lasting behaviour change interventions by making people understand the benefits of change and then helping them make that long term change easy</p>	<p>materials for the same purpose</p> <p>Not sure what this means? Create a waste ecosystem that demands and influences the right behaviours for desired outcomes</p>	
Data and reporting	<p>Work with the Climate Response team to better understand and report on the city's consumption emissions</p> <p>Create and share data and insights to encourage and</p>	<p>Monitor and evaluate system changes to support effective policy making and insights</p>	<p>Monitor and evaluate material and product flows to support effective policy making and insights</p>	<p>Monitor and evaluate waste arisings to support effective policy making and insights</p>

	support progress towards targets			
Partners and stakeholders	<p>Work with Mana Whenua, partners and stakeholders to support the redesign of systems, business models, products and processes.</p> <p>Leave out as covered off in other places including changing design and production, creating new markets for reuse and recycling and inspiring Wellingtonians to cut waste, save resources and reduce Greenhouse Gas emissions</p> <p>Work with Central Government agencies to inform and shape system changes</p> <p>Add</p>	<p>Work with Mana Whenua, partners and stakeholders to scale up interventions to reuse, repair, and enable sharing models</p> <p>Leave out support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery</p> <p>Increase the amount of products and materials recovered, reused and recycled</p> <p>Leave out to minimise waste and reduce the amount of virgin materials used in production</p>	<p>Work with Mana Whenua, partners and stakeholders to scale up interventions to divert, collect, reuse and process products and materials.</p> <p>Leave out support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery</p>	<p>Work with Mana Whenua, partners and stakeholders to scale up interventions to recover and divert as much product and material from landfill as possible</p>

	<p>Work with Councils across Wellington Region to develop and implement the RWMMP</p> <p>Leave out this one below feels like a repeat?</p> <p>Work with Central Government agencies to shape policy decisions that can be developed into actions that prevent waste</p>			
Safe Disposal				<p>Manage the treatment and disposal of sludge</p> <p>Provide for and manage emergency waste</p> <p>Safely manage hazardous waste</p> <p>Ensure that any remaining waste is appropriately managed at Southern Landfill to protect our environment</p>

 **Respondent No:** 79 **Responded At:** Feb 28, 2023 14:43:27 pm

[Redacted]

- Q1. Are you making a submission as an individual or organisation? Organisation
-
- Q2. Name not answered
-
- Q3. Name of organisation Wellington City Council Environmental Reference Group
-
- Q4. Would you like to make a public oral submission? Yes
-
- Q5. Please fill in your email address/contact details so we can contact you to organise an oral submission [Redacted]
-
- Q6. How much do you agree or disagree with the following statement: The strategy provides clarity on council's direction for reducing waste? Agree
-
- Q7. Do you support or oppose Objective 1? Products and services provided in Wellington are waste free – we aim to avoid unnecessary resource use and to design waste out Strongly support
-

<p>Q8. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 1.</p> <p>The suggested priority actions are: • Deliver the benefits of reuse and waste prevention through active use of Council regulations, compliance activities and enforcement • Deliver lasting behaviour change interventions by making people understand the benefits of change and then help them make that long term change easy • Work with partners and stakeholders to empower individuals to have courage to make a change in the world by inspiring individuals to reduce waste and live a more sustainable life • Work with Central Government agencies to shape policy decisions that can be developed into actions that prevent waste • Transform Wellingtonians relationship with packaging • Work with Mana Whenua, partners and stakeholders to support the redesign of systems, including changing design and production, creating new markets for reuse and recycling and inspiring Wellingtonians to cut waste, save resources and reduce Greenhouse Gas emissions • Encourage businesses, social enterprise and charities to create local and regional markets for waste materials.</p>	<p>Undecided</p>
<p>Q9. Do you have further comments on Objective 1 and/or related suggested priority actions?</p>	<p>This is a great objective, and the content of the strategy contains some excellent proposals However, the priority actions are not always clear on how exactly they will be taking forward the key elements of the strategy. See attachment for further comment</p>
<p>Q10. Do you support or oppose Objective 2? Waste reduction is attractive and accessible to Wellingtonians – we aim to make it convenient for residents, businesses and consumers to recycle their waste.</p>	<p>Strongly support</p>

<p>Q11. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 2. The suggested priority actions are:</p> <ul style="list-style-type: none">• Delivery of consistent, equitable and accessible waste collections• Manage funds and revenues to support Wellington’s reuse, re-purpose and recycling capacity by creating a catalyst for other investment• Deliver value for money and sustainable waste services to Wellingtonians• Innovation encouraged to support delivery of Wellington’s transition to a zero-waste future• Monitoring and evaluation of waste arisings (salvage of secondary or waste products) to support effective policy making and insights• Deliver lasting behaviour change interventions by making people understand the benefits of change and then helping them make that long term change easy• Work with Central Government agencies to inform and shape system changes• Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington• Increase the amount of material that is recovered, reused and recycled to minimise waste and reduce the amount of virgin materials used in production• Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery.	<p>Undecided</p>
<p>Q12. Do you have further comments on Objective 2 and/or related suggested priority actions?</p>	<p>The objectives and strategy intent are very good. However we are not sure some of the priority actions in this section directly support the objective. See attached document for further comment.</p>
<p>Q13. Do you support or oppose Objective 3? The infrastructure and systems to increase resource circularity are established – we aim to recover and process materials to regain value from resources.</p>	<p>Strongly support</p>

<p>Q14. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 3. The suggested priority actions are: • Support the provision of consistent, equitable and accessible kerbside waste collections for Wellingtonians • Work together with households, producers, collectors and reprocessors to extract the maximum value possible from food that would otherwise be wasted • Implement a kerbside organic collection and processing service to generate biofertilisers and renewable energy from organic waste • Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington • Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery • Create a waste ecosystem that demands and influences the right behaviours for desired outcomes • Support the creation of markets for secondary materials.</p>	<p>Agree</p>
<p>Q15. Do you have further comments on Objective 3 and/or the related suggested priority options?</p>	<p>The priority actions are generally good for this objective and logical, though many actions could be made clearer. See attached document for further comment.</p>
<p>Q16. Do you support or oppose Objective 4? Waste that cannot be avoided, reduced, reused, or recycled is managed safely – we aim to treat waste infrastructure built today as a finite resource and carefully manage it.</p>	<p>Strongly support</p>
<p>Q17. How much do you agree or disagree with the following statement? The suggested priority actions appropriately deliver on Objective 4. The suggested priority actions are: • Manage the treatment and disposal of sludge • Provide for and manage emergency waste • Ongoing management of the Southern landfill to support Wellington’s transition to a zero waste city • Work with partners and stakeholders to scale up interventions to recover and divert as much waste from landfill and ensure that any remaining waste is appropriately managed at Southern Landfill to protect our environment.</p>	<p>Strongly agree</p>

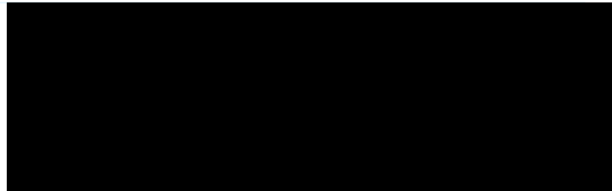
Q18. Do you have further comments on Objective 4 and/or the related suggested priority actions?

In general these support the objective well. See attached document for further comment.

Q19. Do you have any other comments to make on the overall direction of the Zero Waste Strategy?

Please review attached document for further comments.

Q20. Please attach any additional documents/information to support your submission.



Please see further comments from Wellington City Council Environmental Reference Group below.

Contact for further queries: Spencer Clubb [REDACTED]

Alternate contact: Steven Almond [REDACTED]

Q 11. Do you have further comments on Objective 1 and/or related suggested priority actions?

This is a great objective, and the content of the strategy contains some excellent proposals. However, the priority actions are not always clear on how exactly they will be taking forward the key elements of the strategy. They often lack specificity.

We have provided a comment next to each of the priority actions and also noted where we think there are some key gaps. It may be that some of our key gaps are intended to be in the priority actions, but as they are not clear enough, we can't be sure.

- **Deliver the benefits of reuse and waste prevention through active use of Council regulations, compliance activities and enforcement.**

This is a very good priority action but lacks specificity. The action needs to be clearer that this is not just a continuation of the status quo but is a commitment to expanding the use of these powers across all areas mentioned under this objective.

- **Deliver lasting behaviour change interventions by making people understand the benefits of change and then help them make that long term change easy.**

"Change" is rather vague but the action is good if talking about supporting people to be a conscious consumer, and helping with where to take avoidable waste such as electronic items. However, this action is probably in the wrong place as this objective relates to providing waste free products and services.

- **Work with partners and stakeholders to empower individuals to have courage to make a change in the world by inspiring individuals to reduce waste and live a more sustainable life.**

It is unclear how this action differs from the previous one

- **Work with Central Government agencies to shape policy decisions that can be developed into actions that prevent waste.**

This priority action is good.

- **Transform Wellingtonians relationship with packaging**

It is unclear what is meant by this priority action.

- **Work with Mana Whenua, partners and stakeholders to support the redesign of systems, including changing design and production, creating new markets for reuse and recycling and inspiring Wellingtonians to cut waste, save resources and reduce Greenhouse Gas emissions.**

This is a good priority as a means of operating.

- **Encourage businesses, social enterprise and charities to create local and regional markets for waste materials.**

This is a good priority action if it includes financial and business support.

In addition to the above, we believe that the following represent key priority actions. These are needed to deliver on this objective and to achieve the outcomes of the strategy.

If products and services provided are to be waste free this means:

- Much stronger use of bylaws to require businesses to offer waste free products and services and require them to design out waste
- Much stronger use of Council procurement power across all aspects of procurement and indeed funding
- All council services and council funded services, leases, venues, to have an agreed action plan to become waste free
- Much clearer direction on what is expected of businesses in Wellington, how they will be supported, how they can work together to find solutions, and when and where bylaws will be used, including larger corporates
- Much clearer direction on what the plan is to work with mana whenua, how this will impact the problem, and what is possible to achieve.
- As well as working with partners and stakeholders, take a user-centric design approach to delivering solutions by establishing a dedicated process such as a citizens assembly and sector roundtables, with the clear objective of zero waste
- Much more support for businesses to develop, pilot, scale up and deliver circular b2b (and then b2c) solutions to keep resources circulating

Q 14. Do you have further comments on Objective 2 and/or related suggested priority actions?

The objectives and strategy intent are very good. However we are not sure some of the priority actions in this section directly support the objective as they are more focussed on waste prevention and promoting a circular economy, rather than making it easier for residents to recycle. Therefore, they could be placed elsewhere, or are already adequately covered in other objectives. This is a document structure issue, the content is good.

There are some key issues not covered:

- Actions do not discuss the need for site design improvement at Southern Landfill to improve convenience.
- Actions do not include a strategy around cost and levy structures for waste and recycling, and

how this integrates across the city, and regionally. This needs careful thought to foster the desired behaviours. Currently, levy structure is inconsistent and a barrier to effective diversion.

- Ensuring design of resource recovery sites includes residents with accessibility issues.
- Design of sites should be attractive and consistent so that all proposed WCC resource recovery and reuse touch points use standardised design language and pricing, and are user-friendly.

We have included comments on each of the priority actions:

- **Delivery of consistent, equitable and accessible waste collections**

This supports the objective well.

- **Manage funds and revenues to support Wellington's reuse, re-purpose and recycling capacity by creating a catalyst for other investment**

This is a good action, but would fit better within objective 1 or 3.

- **Deliver value for money and sustainable waste services to Wellingtonians**

This supports the objective well.

- **Innovation encouraged to support delivery of Wellington's transition to a zero waste future**

This would fit better in objective 1 or 3.

- **Monitoring and evaluation of waste arisings (salvage of secondary or waste products) to support effective policy making and insights**

This supports the objective well. However, the wording and language makes this difficult for a general audience to understand.

- **Deliver lasting behaviour change interventions by making people understand the benefits of change and then helping them make that long term change easy**

This is a concise action which strongly supports the objective.

- **Work with Central Government agencies to inform and shape system changes**

This is a critical action which strongly supports the objective as diversion infrastructure should be consistent and easy to interpret. A standardised regional / national system greatly enables this.

- **Promote and encourage the reuse of materials for the same purpose and recover materials so that they can be reused throughout Wellington**

Good principle. Language could be clearer i.e. promote and foster reuse schemes (e.g. coffee cups), and recover materials which can't be immediately reused for use elsewhere in Wellington (e.g. building materials).

- **Increase the amount of material that is recovered, reused and recycled to minimise waste and reduce the amount of virgin materials used in production**

This is a key principle which strongly supports the objective, and could be more strongly highlighted.

- **Work with partners and stakeholders to scale up interventions to support the citywide goal to be a leader in minimising the use of resources and maximisation of reuse and recovery**

This strongly supports the objective.

Q 17. Do you have further comments on Objective 3 and/or related suggested priority actions?

The priority actions are generally good for this objective and logical, though many actions could be made clearer. For example; "Create a waste ecosystem that demands and influences the right behaviours for desired outcomes" is more of an outcome than a clear action.

It is also a little strange that renewable energy from organic waste is mentioned in a priority action without being discussed at all within the strategy. It is not clear how appropriate this would be.

There are also some gaps that we feel are essential and should be added to or made much more explicit in the priority actions as follows:

- Conduct a feasibility/research study into markets for food waste, construction waste and plastics
- Invest in an organic processing facility
- Increase resources and scale up the councils compliance department,
- Enforce and expand bylaws
- Commit to building or investing in/supporting a facility for construction waste repurposing

Q 20. Comments on Objective 4 and/or related priority actions (optional)

In general these support the objective well.

There needs to be much more emphasis on finding emergency clean-fill capacity due to Wellington's risk profile.

This sentence requires clearer language and explanation of units for a general audience to understand, "the Council must pay for the greenhouse gas emissions under the Emissions Trading Scheme (ETS) based on calculation of our unique emission factor (UEF); our current UEF is 0.89:1."

The text in the section "Increase resilience to reduce our waste system's vulnerability" mainly defines the problem, rather than the actions to support it. The actions throughout the strategy do support this, as waste reduction systems makes residual waste system more resilient in the instance of a shock-event. This could be explained more clearly.

Q 21. Do you have any comments and ideas in relation the targets of the Zero Waste Strategy?

In addition to our specific comments above, we would like to make some general remarks about the strategy as a whole.

Clearly a lot of careful thinking and expertise has been applied to create the document. It has a very good context section and, as noted above, we are very supportive of the existence of the strategy and the objectives contained within it. Much of our feedback above is on clarifying and strengthening the priority actions..

There are, however, a couple of additional presentational aspects of the strategy that we would recommend are revisited prior to any final version being released.

Firstly, the vision could be made more intuitive and written in plainer English. It might also benefit from a bilingual vision to reflect the aspirations of Māori.

Secondly, we found that the strategy was unnecessarily complicated in structure. It is difficult to follow the various interwoven combinations of priorities, outcomes, objectives and actions. This means that there is often repetition and some elements of the strategy are clearly in the wrong place. We recommend that the strategy is re-worked from the top down to be much clearer and preferably shorter, so that the generally excellent content will be most impactful and effective. In doing so we would also seek greater connection to the three circular economy principles of 1. Design out waste, 2. Keep materials in use, 3. Regenerate natural systems.

Thirdly, it is difficult to assess whether the targets are sufficiently ambitious. Much of their success will be dependent on the rapid progression of some key infrastructure projects and programmes of work relating to sludge, organics, and building and construction, stronger regulations, sufficient funding and mandate for the compliance monitoring and enforcement team and good engagement with the community on their needs. There may be some benefit in illustrating how the strategy will achieve the targets, with a particular focus on the role of these and other keystone projects.

Finally, to ensure that the strategy is clear in both its thinking and presentation, we recommend that a user centric design approach is taken, illustrating how the strategy will impact individuals and businesses. This could be a section highlighting the problem it is attempting to solve, how the priority actions address this problem, and how the proposed solutions are fair and equitable, including application of the polluter pays principle. In line with circular economy thinking, the cost of cleaning up waste should fall largely on those creating it and not on the recipient of that waste.