

19 May 2017

Wellington Region WMMP 2017-2023
Freepost WCC
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Re: Wellington Region Waste Management and Minimisation Plan 2017-2023

This submission is from the Architectural Centre, an incorporated society dating from 1946, which represents both professionals and non-professionals interested in the promotion of good design.

We have the following comments to make regarding the proposed Wellington Region Waste Management and Minimisation Plan 2017-2023:

1. We strongly support this draft Waste Management and Minimisation Plan, but have additional comments below, which we think could strengthen the draft plan. In relation to specific council actions (Part B Local Action Plans) we have confined our comments to those of WCC's proposed actions.
2. The rationale for the plan is largely legislative (i.e. compliance with the Waste Minimisation Act (2008)). This has the problem that the fundamental goal appears both arbitrary and vague, with targets lacking a link to a specific outcome. That is to say that the generic idea, that we need to reduce waste, is without any timeframe or amount needed to be achieved. If the ultimate target is zero-waste this needs to be stated, and the staging of this target made explicit. While it is stated that "We need to look after the environment, protect people's health, and make sure that this is done at an acceptable cost to the community" (p. 7, 1.1), there is no quantification of what actually needs to be achieved in order to address this ambition. In addition the work appears to exist outside of any international context. Work done by organisations, such as the OECD,¹ or that by other countries, might usefully inform this work.
3. We believe that given the council's expressed desire to be a leader in waste minimisation that this draft WMMP needs to articulate with greater precision why the council believes in the value of waste minimisation, and what quantity of waste minimisation needs to be achieved in order to meet this need. Currently the targets are limited by assumptions about what can be

¹ For example, OECD Environment Directorate "Strategic Waste Prevention: OECD Reference Manual" (2 August 2000)
[http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?doclanguage=en&cote=env/epoc/ppc\(2000\)5/final](http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?doclanguage=en&cote=env/epoc/ppc(2000)5/final)



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achieved (p. 19, 4.3), rather than focussed on what needs to be achieved. This appears to conflict with the proposed method to: "Identify specific aspirational targets in the WMMP for each council" (p. 22). These targets also need to be contextualised by the fact that our region is one of the highest generators of household waste, and one of the lowest recyclers, in the country (p. 14, 3.6.1). Our poor performance nationally is made worse with the knowledge that New Zealand has a poor record within the OECD in terms of its percentage of municipal waste going to landfill.²

4. There is reference to cost, cost-benefit and feasibility throughout the document (e.g. pp. 21-22, 5.2), but never is there any economic evaluation of the cost of not reducing waste. There also appears to be a lack of consideration of related costs (e.g. transportation) which are incurred to support our current culture of waste.
5. The Introduction (p. 7, 1.1.1) outlines a case for the councils working together. We support this but also consider that sharing good practice in waste minimisation and management, especially in relation to sustainability and resilience, is important. We also see this as an opportunity for the collective adoption of best practice across the Wellington region.
6. The draft WMMP refers to education as part of possible actions. We consider that in order to achieve meaningful reductions in waste (e.g. food waste) a cultural change is likely to be needed, including understanding the economic levers which affect behaviour. This is not within the realm of the expertise of planners and waste managers, but rather that of psychologists and advertisers. Nor is this the only council activity in which understanding human motivation and behavioural change is critical to making a meaningful difference. Issues related more widely to climate change and transportation (e.g. congestion), for example, also need this expertise. We strongly recommend that GWRC establish an expert group (perhaps as a minimum a psychologist, a PR expert, and an economist) charged with proposing and implementing strategies aimed at effecting behaviour change to support our transition to a sustainable zero-carbon region.
7. The draft plan suggests that there is a surplus of landfills (p. 11, 3.1) and states that WCC will continue to manage closed landfills (p. 109, 10.6.5, IN.10). We consider that closed landfills should be remediated (in terms of land structure and toxicity) to enable new uses. It is also possible that some landfills may be located in areas which, if the land is remediated, might provide land for housing. In relation to the current over-supply of landfills, we support the closure or reduction of landfills and appropriate remediation of affected land.
8. We support the intention to improve information gathering on waste management. We see that including statistics of waste managed by private providers as important. We also encourage the councils to collect data on transport and other costs which support different aspects of waste to better inform economic analysis including the cost of not acting to reduce waste. We recommend that information gathering align with OECD work investigating waste prevention performance indicators.³

² "Ministry blasts report on NZ's environment record" *Radio New Zealand* (28 October 2015)

<http://www.radionz.co.nz/news/national/288230/ministry-blasts-report-on-nz-s-environment-record>

³ OECD Environment Directorate "OECD workshop in waste prevention: toward performance indicators" (Paris, 8-10 October 2001)

[http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?doclanguage=en&cote=env/epoc/wgwrpr/se\(2002\)1/final](http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?doclanguage=en&cote=env/epoc/wgwrpr/se(2002)1/final); also: OECD Environment Directorate "Towards waste prevention performance indicators" (30 September 2004)

9. We support a "polluter pays" strategy, common to other countries such as Iceland.⁴ User charges need to ensure a direct relationship between the cost of a user charge and wasteful behaviour, and we consider this to be a key part of any education strategy. Consequently we do not support funding by "a general charge that is paid by all ratepayers," but rather a fully-costed user pays system for waste. We do however support a general rates charge to fund re-use and recycling infrastructure.
10. We also consider that in addition to the listed considerations related to funding (p. 24), reducing food waste be prioritised (as this appears to be an area in which the greatest reductions can be made), and that "Affordability" as a consideration should include the wider economic cost of not taking action.
11. We note that there is little acknowledgement of the limited range of plastics currently recycled (apart from the reference to polystyrene p. 108, 10.6.5, IN.7), in the draft WMMP, and past practices of stockpiling plastic when it was not viable to recycle. We encourage an expansion of the range of plastic types able to be recycled, and hope that this initiative to address waste minimisation and management at a regional level might enable this to occur.
12. There is no proactive statement regarding waste prevention.
13. In addition to the above we support:
 - (a) education programmes for school children (and others) (e.g. p. 102, 10.6.3 E.1, E.2 etc.),
 - (b) user pays for rubbish collection (c.f. recycling), and consider that the current charge on WCC rubbish bags is a useful mechanism to do this,
 - (c) compost/food waste collection from apartments, and residences with no or little land for composting. This might include support for Bokashi composting systems (p. 101, 10.6.1 R.3),
 - (d) a shift to increase kerb-side glass and other recycling collection to weekly collections while making rubbish collections fortnightly,
 - (e) council initiatives to encourage adaptive re-use of buildings,
 - (f) electronic rather than paper plan lodgements for resource and building consents,
 - (g) requirements for waste minimisation and management plans in building consent applications,⁵
 - (h) any local initiatives for glass, aluminium, steel and plastic re-use schemes (e.g. bottle exchanges). Re-used glass, in particular, saves significantly more energy than re-cycling glass. As an example of a deposit system, Iceland achieves an over 80% return rate for refillable and non-refillable bottles, and cans.⁶
 - (i) the use of design to reduce waste, including messaging (e.g. education messages on council rubbish bags; recycling messages on recycling bags and plastic bins for glass recycling), and

[http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?doclanguage=en&cote=env/epoc/wgwpr/se\(2004\)1/final](http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?doclanguage=en&cote=env/epoc/wgwpr/se(2004)1/final)

⁴ "Waste Management in Iceland" p. [5],

http://english.ust.is/media/ljosmyndir/mengun/Waste_Management_in_Iceland_1_feb_05.pdf

⁵ see: Wrap "Achieving good practice Waste Minimisation and Management" (Oxon: Waste & Resources Action Programme, c2008)

<http://www.wrap.org.uk/sites/files/wrap/achieving%20good%20practice%20waste%20minimisation%20and%20management.pdf>

⁶ "Waste Management in Iceland" p. [7],

http://english.ust.is/media/ljosmyndir/mengun/Waste_Management_in_Iceland_1_feb_05.pdf

- (j) the banning of specific items from landfill, for example, Iceland bans: scrap metal, liquid waste, hazardous waste and tyres from landfill.⁷

Thank you for this opportunity to comment on the Wellington Region Waste Management and Minimisation Plan 2017-2023 consultation. The Architectural Centre considers that reducing waste is an important step towards a more sustainable and zero-carbon region. If you have any questions please do not hesitate to contact me.

Yours faithfully



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⁷ "Waste Management in Iceland" p. [4],
http://english.ust.is/media/ljosmyndir/mengun/Waste_Management_in_Iceland_1_feb_05.pdf