

Compostable Packaging Technical Advisory Group

The Packaging Forum

response to:

Te hau mārohi ki anamata

Transitioning to a low-emissions and climate-resilient future

The compostable packaging technical advisory group is a subset of members of The Packaging Forum who have a special interest in any packaging that is labelled as compostable or commonly composted.

The Forum strongly advocates for the use of product stewardship as a tool for achieving waste and emissions reductions as well as for driving New Zealand towards a circular economy. The Forum would therefore like to see product stewardship used to far greater effect in future iterations of Government's *Emissions Reduction Plan* as it has little mention in the current consultation document. This is especially important when dealing with the issue of waste.

16. How can Government further support households (particularly low-income households) to reduce their emissions footprint?

- Support households to reduce food waste at home through ensuring all local government implement food waste collection services and provide the levers to make it successful, such as bin liners.
- Enabling compostable packaging to be part of the toolkit to divert food waste away from landfill and into composting/Anaerobic digestion. – see waste section for more information and supporting evidence.
- Support technology platforms like CoGo who aim to help consumers measure their carbon footprint and reduce emissions

89. The Commission's recommended emissions reduction target for the waste sector significantly increased in its final advice. Do you support the target to reduce waste biogenic methane emissions by 40 per cent by 2035?

Yes

90. Do you support more funding for education and behaviour change initiatives to help households, communities, and businesses reduce their organic waste (for example, food, cardboard, timber)?

Yes, absolutely. However, we first need a definition for organic waste to work from.

91. What other policies would support households, communities, and businesses to manage the impacts of higher waste disposal costs?

Policies need to enable the “how” to reduce waste to landfill. Supporting the development of processing capacity in recycling, composting, AD and transport of materials to get there (collections systems) and providing funding support to offset the costs of those systems will ensure landfill is more expensive than diversion.

What do we mean by the “how?” There are practical levers like the below example (of compostable packaging bin liners being standardised, regulated and made mandatory for all kerbside food waste collections) which can be urgently implemented and mandated, to increase food waste diversion. This same logic can be applied to specific applications of compostable packaging, where the food waste contained in food packaging either:

- a) Goes to landfill
- b) Contaminates the recycling stream when the consumer does not clean their recyclables adequately

In these situations, and particular applications, (the right kind of) compostable packaging can be a facilitator of food waste diversion from landfill.

The Department of Communications, Climate Action and Environment (DCCA) in Ireland undertook a Food Waste Recycling Pilot Project during 2018-2020, which gave compostable bin liners to pilot participants to attempt to increase participation in existing food waste collections services.

Pilot participants in the region of Trim, Co Meath were surveyed on which tools encouraged them to recycle food waste

- 61% said it was the kitchen caddy and compostable bags
- 9% said the information leaflet
- 3% said the sticker on the residual bin
- 11% said because it's the law
- 15% because it saves money.

The same study found in the region of Ballaghaderreen, Co Roscommon that food waste recycling increased by 20% during their trial. Education also decreased contamination of food waste (by non-compostable packaging) reducing by an impressive 56%.

A different study, the National Brown Bin Awareness Pilot scheme in Sligo City undertaken in 2014/15 aimed to see how providing tools to households, including kitchen caddy liners could improve participation. The study found that participation rates had a change in participation increase by between 8% (awareness/education only) through to 51% (education, provision of a solid caddy and compostable bin liners). Equally as interesting, contamination rates dropped by up to 96% down to as low as 1% contamination, during this pilot scheme.

The City of Holdfast Bay and Green Industries in South Australia in 2019 undertook a pilot working with supermarkets to introduce compostable fruit and vegetable bags, which could be reused in household caddies for kerbside food waste collection. The pilot found an increase in food waste collected of 0.4kg/household/week during the trial.

Not only do we need to increase the number of districts across New Zealand where kerbside and commercial food waste collections (and processing) systems are in place, but we need to ensure participation rates are high. Kerbside food waste collection participation rates drop off, particularly in summer, when maggots and putrefaction are off-putting for consumers. Caddy liners resolve these issues for consumers by making the experience much more pleasant, increasing participation rates and improving outcomes for food waste diversion from landfill. Caddy liners also show a reduction in contamination, which is critical to the health and safety of our (compost) soils.

Tackling the issue of waste to landfill is something of an ambulance at the bottom of a cliff, where emphasis should be placed on reducing the creation of waste in the first place. Here we believe industry-led product stewardship has a vital role to play. Through stewardship, be it voluntary or regulated (as appropriate), waste is designed out and the waste which is created has alternative avenues to landfill so the resources can be reused, recycled, composted or repurposed.

92. Would you support a proposal to ban the disposal of food, green and paper waste at landfills for all households and businesses by 1 January 2030, if there were alternative ways to recycle this waste instead?

Yes or no

No, we could not support a ban for paper waste until a definition and clarification was provided. Does this include all compostable packaging, all multi-layer combination packaging (e.g. paper cups lined with plastic), paper food packaging etc?

We agree with a proposal to ban the disposal of food and greenwaste only to landfill by 1/1/2030 in principle provided collections and processing were in place by that date.

93. Would you support a proposal to ban all organic materials going to landfills that are unsuitable for capturing methane gas?

No. Potentially, however a definition needs to be provided for organic materials. Organic materials can include textiles, packaging and food/green waste along with many other inputs.

94. Do you support a potential requirement to install landfill gas (LFG) capture systems at landfill sites that are suitable?

Yes

95. Would you support a more standardised approach to collection systems for households and businesses, which prioritises separating recyclables such as fibre (paper and cardboard) and food and garden waste?

Yes, however, a definition for fibre needs to be developed and a work programme to collect more high-quality recyclable fibre for recycling. Any fibre designed to be used as a food contact material "FCM" needs to be compostable and used as a vehicle to deliver food waste residue to composters. No fibre should be composted or applied to soil without appropriate certification and stewarding through a national product stewardship scheme. To optimise recycling of fibre it must be clean and free from food residue.

We support FOGO collection at kerbside which includes approved fibre and other compostable packaging (used in limited and approved applications in a product stewardship system). Compostable packaging has the most emissions reduction/benefit potential when acting as a conduit for food waste diversion from landfill. Compostable packaging makes it easier, cleaner and more pleasant for consumers to separate food waste for collection. Compostable packaging also ensures valuable food residue isn't:

- Put into recycling contaminating recycling streams
- Washed away from recycling to be captured and landfilled at wastewater treatment plants

- Put into landfill with dirty recycling (lost recycling and lost food waste nutrients).

96. Do you think transfer stations should be required to separate and recycle materials, rather than sending them to landfill?

If this is feasible then yes, we would support.

97. Do you think the proposals outlined in this document should also extend to farm dumps?

If this is feasible then yes, we would support. Smaller networks of compost facilities could be better for rural areas rather than transport to centralised locations.

98. Do you have any alternative ideas on how we can manage emissions from farm dumps, and waste production on farms?

No comment

99. What other options could significantly reduce landfill waste emissions across Aotearoa?

Use compostable packaging as a tool to collect food waste for diversion into composting or AD. We believe industry-led product stewardship has a vital role to play. Through stewardship, be it voluntary or regulated (as appropriate), waste is designed out and the waste which is created has alternative avenues to landfill so the resources can be reused, recycled, composted or repurposed.