

# THE PACKAGING FORUM



*The response to Packaging Forum:*

Te hau mārohi ki anamata

Transitioning to a low-emissions  
and climate-resilient future

(waste section)

## Executive summary

The Packaging Forum welcomes the Ministry for the Environment's Emissions Reduction Plan.

The Forum represents the depth and breadth of New Zealand's packaging industry, with the Glass Packaging Forum product stewardship scheme for container glass and Soft Plastic Recycling Scheme under its governance.

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.

1. DO YOU AGREE THAT THE EMISSIONS REDUCTION PLAN SHOULD BE GUIDED BY A SET OF PRINCIPLES? IF SO, ARE THE FIVE PRINCIPLES SET OUT ABOVE THE CORRECT ONES? PLEASE EXPLAIN WHY OR WHY NOT.

Yes. We support all five in principle.

2. HOW CAN WE ENABLE FURTHER PRIVATE SECTOR ACTION TO REDUCE EMISSIONS AND HELP ACHIEVE A PRODUCTIVE, SUSTAINABLE AND INCLUSIVE ECONOMY? IN PARTICULAR, WHAT KEY BARRIERS COULD WE REMOVE TO SUPPORT DECARBONISATION?

It must be recognised that the large corporates globally must report on carbon reductions and contain these within the business as a shareholder reporting requirement.

This foundation has potential to be developed within a NZ business context that provides business tools to measure and understand the opportunities that will support this direction. This must be supported through appropriate incentive/penalties. No clarity is provided around mechanism that might be considered to deliver business with the knowledge to make change.

### 16. HOW CAN GOVERNMENT FURTHER SUPPORT HOUSEHOLDS (PARTICULARLY LOW-INCOME HOUSEHOLDS) TO REDUCE THEIR EMISSIONS FOOTPRINT?

The separation of waste/resource at source through an integrated collection network at kerbside and community hubs will provide the most cost-effective simple solution for households. This needs to be integrated with rather than reviewed separately to stewardship solutions.

E.g. Food waste and organic waste (FOGO) is a significant issue. Encouraging the separation of this material through a separated collection will drive change. Underlying this will be how such a scheme would support/integrate with a compostable packaging solution. E.g. Bin liners should be of compostable material and easily recognised. E.g. green only, thus simplifying the consumer message and visibly identifying non-compliant compostable packaging. Further there needs to be clear differentiation between paper and card that is best suited to go through a compost network (e.g. food contaminated fibre board) and that which needs to go through a Fibre (paper and cardboard) Stewardship scheme.

18. WHAT ADDITIONAL RESOURCES, TOOLS AND INFORMATION ARE NEEDED TO SUPPORT COMMUNITY TRANSITION PLANNING?

All systems will need to be supported through appropriate communications plans, which need a level of co-ordination.

19. HOW COULD THE UPTAKE OF LOW-EMISSIONS BUSINESS MODELS AND PRODUCTION METHODS BE BEST ENCOURAGED?

The development of simple cost-effective system that can operate at scale., will underpin the best outcomes. Extreme caution must be taken with either multiple small, similar solutions and or overly legislated solutions as the will erode simplification and therefore cost.

21. IN ADDITION TO THE CLIMATE CHANGE COMMISSION MONITORING AND REPORTING ON PROGRESS, WHAT OTHER MEASURES ARE NEEDED TO ENSURE GOVERNMENT IS HELD ACCOUNTABLE?

There must be

- a) A centralised data base of all information that is accessible by any party (assumed to be at a cost) thus ensuring the best decisions rather than perceived decisions are made
- b) Tools and support that allows especially small business to engage in the outcome, that minimises cost to these businesses.

23. IS THERE ANYTHING ELSE YOU WISH TO SHARE IN RELATION TO GOVERNMENT ACCOUNTABILITY AND COORDINATION

The government must clearly differentiate between, the legislative division and the operational delivery of the system.

24. WHAT ARE THE MAIN BARRIERS OR GAPS THAT AFFECT THE FLOW OF PRIVATE CAPITAL INTO LOW EMISSIONS INVESTMENT IN AOTEAROA?

Uncertainty of regulatory change and risk of direction change between governments.

27. IS THERE ANYTHING ELSE YOU WISH TO SHARE IN RELATION TO FUNDING AND FINANCING

Many government funding channels appear cumbersome and slow. The waste minimisation fund for example lacks clarity on the purpose of funding especially in capital release to a strategic direction.

All funding processes should align with an overall strategy and considering impact on carbon emissions must be part of the decision-making process.

More opportunities for public private partnerships should be considered.

Priority areas should by logic have better access to funds, followed by innovation. Lower focus areas would have more limited access.

89. THE CLIMATE CHANGE 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.**

While we agree in principle, this must be caveated with the resources through material stewardship and the new waste strategy. For example when considering organic matter in this process there is a complete lack of reference to packaging labelled as compostable or commonly composted. As this is small but increasing, consideration must be given and how this material may impact emissions.

91. WHAT OTHER POLICIES WOULD SUPPORT HOUSEHOLDS, COMMUNITIES AND BUSINESSES TO MANAGE THE IMPACTS OF HIGHER WASTE DISPOSAL COSTS?

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. This falls in line with the Ministry for the Environment's circular economy focus, which is also a central theme of its *Taking responsibility for our waste* consultation document.

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?

**No.**

While we do support the principle, there would need to be sufficient, national, standardised collection systems and processing infrastructure in place to ensure this material is recycled, reused or composted and that there were no unintended consequences. An accompanying educational programme to help support food waste reduction would also need to be put in place to encourage behaviour change and empower consumers to make the right decisions.

93. WOULD YOU SUPPORT A PROPOSAL TO BAN ALL ORGANIC MATERIALS GOING TO LANDFILLS THAT ARE UNSUITABLE FOR CAPTURING METHANE GAS?

**No.**

While we agree with the principle, this would be dependent on sufficient national collection systems and processing infrastructure for material not going to landfill.

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.**

This will drive higher quality resource recovery and minimise waste to landfill.

The Packaging Forum has long supported standardised kerbside collections of separated recyclable material. The packaging industry is eager to offer sustainable options (eg packaging made of easy-to-recycle plastic like PET HDPE, and PP plastic, or fibre).

The Packaging Forum's Glass Packaging Forum reporting indicates that more and better quality glass is recovered for recycling from separated kerbside collection. Recycling glass reduces carbon emissions due to:

- Reducing the emissions from the carbon event of amalgamating raw materials in the furnace
- Reduced energy requirements, as the furnace can run at lower temperatures
- Reduced need for the extraction of raw materials

Additionally the support of glass reuse programmes can also reduce carbon emissions

The Packaging Forum's Soft Plastic Recycling Scheme has been an early adopter of the Australasian Recycling Label and we support industry wide implementation of labelling consistent with the Australian market given 95% of barcodes in the food and grocery market are common in both markets.

However, labelling of products which are available country-wide is dependent on a standard, national collection and processing system for the material being place.

96. DO YOU THINK TRANSFER STATIONS SHOULD BE REQUIRED TO SEPARATE AND RECYCLE MATERIALS, RATHER THAN SENDING THEM TO LANDFILL?

**Yes.**

Many transfer stations are already doing this to some extent. This is standard practice for example in the UK and we note that MFE is advocating uptake of the UK's policy framework for waste. This should also extend to community recycling schemes.

This needs to be aligned with standardised collection and alignment with material stewardship schemes.

Well-run and maintained standardised national kerbside collections, alongside product stewardship and public behaviour change initiatives to address contamination, should eliminate the majority of recyclable materials from the landfill waste stream.

97. DO YOU THINK THE PROPOSALS OUTLINED IN THIS DOCUMENT SHOULD ALSO EXTEND TO FARM DUMPS?

**No position.**

98. DO YOU HAVE ANY ALTERNATIVE IDEAS ON HOW WE CAN MANAGE EMISSIONS FROM FARM DUMPS, AND WASTE PRODUCTION ON FARMS?

**No position.**

99. WHAT OTHER OPTIONS COULD SIGNIFICANTLY REDUCE LANDFILL WASTE EMISSIONS ACROSS AOTEAROA?

The Packaging Forum is a strong advocate for product stewardship as a means of reducing the volume of waste going to landfill. We feel strongly that Government should support and enable voluntary stewardship and use the tools of regulated stewardship where appropriate, to achieve circular solutions and incentivise waste reduction.