
ORDINARY MEETING
OF
STRATEGY AND POLICY COMMITTEE
AGENDA

Time: 9:30am
Date: Wednesday, 21 October 2020
Venue: Ngake (16.09)
Level 16, Tahiwī
113 The Terrace
Wellington

MEMBERSHIP

Mayor Foster
Councillor Calvert (Deputy Chair)
Councillor Condie
Councillor Day (Chair)
Councillor Fitzsimons
Councillor Foon
Deputy Mayor Free
Councillor Matthews
Councillor O'Neill
Councillor Pannett
Councillor Paul
Councillor Rush
Councillor Sparrow
Councillor Woolf
Councillor Young

NON-VOTING MEMBERS

Te Rūnanga o Toa Rangatira Incorporated
Port Nicholson Block Settlement Trust

Have your say!

You can make a short presentation to the Councillors at this meeting. Please let us know by noon the working day before the meeting. You can do this either by phoning 04-803-8334, 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 role of the Strategy and Policy Committee is to set the broad vision and direction of the city, determine specific outcomes that need to be met to deliver on that vision, and set in place the strategies and policies, bylaws and regulations, and work programmes to achieve those goals.

In determining and shaping the strategies, policies, regulations, and work programme of the Council, the Committee takes a holistic approach to ensure there is strong alignment between the objectives and work programmes of the seven strategic areas covered in the Long-Term Plan (Governance, Environment, Economic Development, Cultural Wellbeing, Social and Recreation, Urban Development and Transport) with particular focus on the priority areas of Council.

The Strategy and Policy Committee works closely with the Annual Plan/Long-Term Plan Committee to achieve its objective.

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

Quorum: 8 members

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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

The minutes of the meeting held on 8 October 2020 will be put to the Strategy and Policy Committee for confirmation.

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 Strategy and Policy Committee.

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 Strategy and Policy Committee.

Minor Matters relating to the General Business of the Strategy and Policy Committee.

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 Strategy and Policy Committee 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

PROPOSED SOLID WASTE MANAGEMENT AND
MINIMISATION BYLAW 2020 ORAL HEARINGS

Purpose

1. This report asks the Strategy and Policy Committee to recognise the speakers who will be speaking to their submissions regarding the Proposed Solid Waste Management and Minimisation Bylaw 2020 consultation.

Recommendation/s

That the Strategy and Policy Committee:

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

Background

2. The Strategy and Policy Committee approved the proposed Solid Waste Management and Minimisation Bylaw and the proposed Bylaw Controls for public consultation on 18 June 2020, in accordance with the Special Consultative Procedure, as set out by the Local Government Act 2002.
3. Wellington City Council consulted on the Proposed Solid Waste Management and Minimisation Bylaw 2020 between 4 August 2020 and 25 September 2020.
4. During the consultation, each submitter was asked if they would like to speak to their submission at a Committee hearing.

Discussion

5. Attachment 1 is a list of the confirmed submitters who have indicated that they wish to speak to their submissions, in speaking order.

Next Actions

6. Following the hearings, the analysis of submissions and accompanying report is due to come before the Strategy and Policy Committee at the meeting of November 5.

Attachments

Attachment 1. Speakers' Submissions [↓](#) 

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Author	Hedi Mueller, Democracy Advisor
Authoriser	Jennifer Parker, Democracy Services Manager Sam Rossiter-Stead, Acting Chief Strategy and Governance Officer

SUPPORTING INFORMATION

Engagement and Consultation

This report provides for a key stage of the consultation process – the opportunity for the public to speak to their written submission.

Treaty of Waitangi considerations

There are no Treaty of Waitangi considerations arising from this report. Submitters may speak to matters that have Treaty of Waitangi implications.

Financial implications

There are no financial implications arising from this report. Submitters may speak to matters that have financial implications.

Policy and legislative implications

There are no policy implications arising from this report. Submitters may speak to matters that have policy implications.

Risks / legal

This consultation and the hearings process have been run in accordance with the Special Consultative Procedure, as set out by the Local Government Act 2002.

Climate Change impact and considerations

There are no climate change implications arising from this report. Submitters may speak to matters that have climate change implications.

Communications Plan

Not applicable.

Health and Safety Impact considered

Participants are able to address the Committee either in person or via virtual meeting. Democracy Services staff have offered full assistance to submitters in case of any unfamiliarity with using Zoom.

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
Feedback

Submissions recieved on the Proposed Solid Waste Management and Minimisation Bylaw 2020

4th August 2020 - 25th September 2020

**Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
Feedback**

Submitter: Neville Walsbrod Suburb: Te Aro On behalf of: An individual	28
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Q1. You are making this submission as: Individual

Q2. Would you like to make an oral submission to the Councillors on Thursday, 22 October 2020? Yes

Q3. **Multi-unit dwellings**The Council is proposing that all new large multi-unit developments (comprising of 10 or more dwellings), provide adequate space for the storage and collection of all waste generated within that development.The Bylaw also requires a related waste management plan to be submitted to the Council prior to building construction. This plan will need to demonstrate, amongst other things, how waste material generated on site will be minimised.

To what extent do you agree or disagree with the proposed Bylaw requirements regulating waste management and minimisation planning for multi-unit dwellings? Definitely agree

Q4. **Event waste management**The Bylaw seeks to regulate waste management and minimisation when planning a large event of 1000+ people. An event is proposed to include any organised temporary activity of significant scale that is likely to create litter and includes (but is not limited to) an organised outdoor gathering, open-air market, parade, sporting event, protest, festival, concert or celebration.While indoor private functions, indoor performances and regularly occurring recreational activities such as sports events are excluded from this standard, other event organisers will be required to submit an event management plan to the Council for approval prior to the event.The plan would need to demonstrate: (1) how waste generated by the event is to be minimised; (2) the steps that will be taken to maximise the use of reusable systems, recycling and composting; and (3) the proposed method for minimising and capturing litter associated with the event.

To what extent do you agree or disagree with the proposed event waste management and minimisation standards for Definitely agree

Q5. **Construction and demolition waste management**The proposed Bylaw and associated Bylaw controls requires all large construction projects (valued at \$2 million+) to consider waste management and minimisation planning as part of their project planning and submit an associated construction site and demolition waste management plan to the Council for approval.Amongst other things, this plan will need to set out: (1) the proposed method of waste management for each type of waste (e.g. reuse, recovery, recycling, disposal); and (2) the proposed method for minimising and capturing litter associated with the project and the building work.

To what extent do you agree or disagree with the proposed requirement to consider waste management and minimisation planning for high value building projects? Definitely agree

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
Feedback

- Q6. Restricting unaddressed and advertising mail The Bylaw proposes to formally restrict the deposit of unaddressed mail or advertising mail in letter boxes that are clearly marked with the words "no circulars", "no junk mail" or "addressed mail only". There are exceptions for public notices from the government, as well as for different types of information from community organisations and charities.

To what extent do you agree or disagree with this new restriction? Definitely agree

- Q7. Waste Operator licensing The Council has proposed to establish Waste Operator licensing. This would involve mandatory licensing for any person or entity that collects or transports more than 20 tonnes of waste per year within the Wellington City District. Licensing would not apply to individuals who collect or transport waste for personal reasons. The primary purpose of this proposed licensing system is for the Council to collect relevant waste-related data from the private sector and to ensure private waste operators are operating in a manner that is consistent with the Council's waste-related objectives.

To what extent do you agree or disagree with the establishment of waste operator and facility licensing? Definitely agree

- Q8. Proposed Bylaw controls A new set of bylaw controls is also proposed that may affect how you dispose of your waste and recycling. Amongst other things, these controls regulate waste and recycling servicing and collection times, restrict servicing access for new multi-unit developments (of 10 or more dwellings), restrict servicing access on private roads and on roads where there are operational limitations, restrict the amount of green waste permitted within Council waste receptacles, and prohibit a range of dangerous or potentially hazardous material from being deposited into kerbside waste bags or containers. The controls also introduce a new set of waste separation standards for users of the Southern Landfill.

To what extent do you agree or disagree with the proposed bylaw controls? Definitely agree

- Q9. Are there any other comments you would like to make about the proposed Bylaw and/or the proposed Bylaw controls?

I think that the proposal is great. My reservation is that we already have rules regarding the disposal of rubbish but close to no enforcement. According to Councillor Laurie Foon illegal rubbish collecting is costing the rate payer around half a million dollars. This at the current tip fees which I understand are to be increased. I have been in contact with the council for nearly two years regarding this issue with a and have had the run around as to who is responsible for enforcement. The contractor has instructions to collect ALL the rubbish on the streets with no questions asked and without enforcement the new rules will not change anything. Wellington is one of the only large cities in NZ without a litter officer which I find strange and as a result there is no reason for someone to pay to collect rubbish in the central city when they can simply dump it on the street. A sign has been placed near my apartment warning people that they can be fined for dumping and rubbish bags are placed next to the sign with no consequences. Unless there is appropriate enforcement (no warnings) people will not change their behaviour. I suggest that WCC have at least two full time litter officers. It will save over \$400,000 p/a

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
 Feedback

Submitter: Ella Fiaveli

Suburb: N/A

On behalf of: Wellington Youth Council

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- Q1. You are making this submission as: Wellington City Youth Council (Youth Council)
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- Q2. Would you like to make an oral submission to the Councillors on Thursday, 22 October 2020? Yes
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- Q3. Multi-unit dwellingsThe Council is proposing that all new large multi-unit developments (comprising of 10 or more dwellings), provide adequate space for the storage and collection of all waste generated within that development.The Bylaw also requires a related waste management plan to be submitted to the Council prior to building construction. This plan will need to demonstrate, amongst other things, how waste material generated on site will be minimised.
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Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
Feedback

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Q9. Are there any other comments you would like to make about the proposed Bylaw and/or the proposed Bylaw controls?

Introduction 1. The Wellington City Youth Council (Youth Council) welcomes the chance to submit on the Solid Waste Management and Minimisation Bylaw 2020. 2. Overall, we see this bylaw as a positive step in the right direction. Wellington's level of waste heading to landfill per capita is well above national averages, and Youth Council echoes the calls of many young people that is not acceptable. 3. We agree with the vibe of the bylaw that overall education as opposed to enforcement is the best approach, especially when combined with good planning. We see this bylaw as an important first step, however we believe that more will need to be done with incentives and targets to see the reduction in solid waste been created. 4. It has become clear that recycling is not a silver bullet and that the minimisation of waste been created is the only effective solution to this. Licensing of waste collectors and operators 1. Youth Council supports the licensing of waste collectors and operators as this move will allow Council to have a far better handle on how waste is collected, ensuring it is done in an effective safe and sustainable manner. We think the most valuable step from this will be the information that Council will collect about waste streams. 2. We believe that as part of the licensing there should be a provision that the companies that are contracted pay their staff a living wage and ensure that all health and safety guidelines are adhered to. Management of construction and demolition (C&D) waste 5. The proposed bylaw provisions require that any building or demolition work above a certain value to have a waste management plan. Youth Council sees this as an important step forward as it is clear from the data that C&D waste is a major contributor to the city's waste profile. 6. Having clear outlines of the quantity and type of waste created and what can and cannot be recovered is an excellent step with having the data it will allow the WCC to target its approach in the future. 7. Although the Youth Council sees this as a valuable step, ideally, we would like to see some form of a target to reduce waste from construction and demolition, or a regulatory enforcement mechanism. 8. One such approach is reduced consenting cost to incentive construction firms to reduce the amount of waste and increase the amount of recovered materials. 9. We would also like to see a waste management plan become a part of all construction and demolition jobs in future, with the number of residential developments expected to increase in coming years we believe that they should be included at all levels. Management of unaddressed mail and advertising material 10. Better management of unaddressed mail and advertising material is an excellent move that Youth Council believes is long overdue. 11. After conducting a quick poll of Youth Council, it was discovered that no one had actually used any form of advertising mail in the last five years. Waste management for events 12. Youth Council agrees with better event waste management as large events are a major source of waste. 13. Young people often make up a disproportionate number of attendees, and it is clear from our experience and talking to others that many are frustrated at the level of waste and single use items which litter such events. 14. Having a plan to manage this waste is an excellent move. Youth Council hopes that Council will assist and guide event organisers to create more sustainable events. Multi-Unit Dwellings 15. Youth Council supports Council's proposal to manage waste to limit public nuisance and urban amenity issues, and the focus on setting out conditions for waste collection at new multi-unit dwellings. 16. Issues created from waste stopping Wellingtonians using public places and amenities need to be addressed, including waste and recycling bins stopping footpath access and piles of waste and recycling at multi-unit dwellings. 17. We note that education remains a critical element of Wellington's overall waste strategy with residents, including students and young professionals who often do not understand Wellington's waste and recycling systems if they have just moved to Wellington, and who often do not have the information to help understand the systems. 18. More work is needed to enable Wellingtonians to take up waste and recycling options, rather than locking in previous restrictions and blacklisting of houses or streets for inappropriate waste and recycling practices. 19. Council should better engage with those households whose waste and recycling practices are inappropriate, to educate these groups. 20. Council's focus on

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:**Feedback**

ensuring that there are rules in place for new multi-unit dwellings of 10 and above is important to ensure that denser housing Wellington has adequate waste and recycling facilities. 21. However, we wonder if more of a distinction needs to be made over the types of multi-unit dwellings. High density apartments are likely to require a different waste and recycling approach and strategy compared to medium density townhouses, which may be able to be included in usual waste and recycling collections without issue. 22. We recommend that Council investigate the diverse needs and issues that should be considered between different housing types. 23. We note that the Bylaw is silent about existing multi-unit dwellings, which leaves many residents in an unknown position around their waste and recycling options. Some multi-unit dwellings which do not have waste and recycling facilities are also currently excluded from Council services, meaning that creating more waste is inevitable. 24. Although there may be significant challenges in forming and implementing solutions for multi-unit dwellings, we expect that this area is important to tackle, with the risk that waste volumes will continue expand if the status quo remains.

Solid Waste Management and Minimisation Bylaw 2020 Submission

To Wellington City Council

September 2020

We would like to appear in person to support our submission

Contact person:

Ella Flavell, Chair
Wellington City Youth Council

c/o Wellington City Council
PO Box 2199, Wellington 6140

Wellington City Youth Council
Te Rūnanga Taiohi o te Kaunihera o Pōneke

Wellington City Youth Council
Te Rūnanga Taiohi o te Kaunihera o Pōneke**Introduction**

1. The Wellington City Youth Council (Youth Council) welcomes the chance to submit on the Solid Waste Management and Minimisation Bylaw 2020.
2. Overall, we see this bylaw as a positive step in the right direction. Wellington's level of waste heading to landfill per capita is well above national averages, and Youth Council echoes the calls of many young people that is not acceptable.
3. We agree with the vibe of the bylaw that overall education as opposed to enforcement is the best approach, especially when combined with good planning. We see this bylaw as an important first step, however we believe that more will need to be done with incentives and targets to see the reduction in solid waste been created.
4. It has become clear that recycling is not a silver bullet and that the minimisation of waste been created is the only effective solution to this.

Licensing of waste collectors and operators

1. Youth Council supports the licensing of waste collectors and operators as this move will allow Council to have a far better handle on how waste is collected, ensuring it is done in an effective safe and sustainable manner. We think the most valuable step from this will be the information that Council will collect about waste streams.
2. We believe that as part of the licensing there should be a provision that the companies that are contracted pay their staff a living wage and ensure that all health and safety guidelines are adhered to.

Management of construction and demolition (C&D) waste

5. The proposed bylaw provisions require that any building or demolition work above a certain value to have a waste management plan. Youth Council sees this as an important step forward as it is clear from the data that C&D waste is a major contributor to the city's waste profile.
6. Having clear outlines of the quantity and type of waste created and what can and cannot be recovered is an excellent step with having the data it will allow the WCC to target its approach in the future.
7. Although the Youth Council sees this as a valuable step, ideally, we would like to see some form of a target to reduce waste from construction and demolition, or a regulatory enforcement mechanism.
8. One such approach is reduced consenting cost to incentive construction firms to reduce the amount of waste and increase the amount of recovered materials.

Wellington City Youth Council
Te Rūnanga Taiohi o te Kaunihera o Pōneke

9. We would also like to see a waste management plan become a part of all construction and demolition jobs in future, with the number of residential developments expected to increase in coming years we believe that they should be included at all levels.

Management of unaddressed mail and advertising material

10. Better management of unaddressed mail and advertising material is an excellent move that Youth Council believes is long overdue.
11. After conducting a quick poll of Youth Council, it was discovered that no one had actually used any form of advertising mail in the last five years.

Waste management for events

12. Youth Council agrees with better event waste management as large events are a major source of waste.
13. Young people often make up a disproportionate number of attendees, and it is clear from our experience and talking to others that many are frustrated at the level of waste and single use items which litter such events.
14. Having a plan to manage this waste is an excellent move. Youth Council hopes that Council will assist and guide event organisers to create more sustainable events.

Multi-Unit Dwellings

15. Youth Council supports Council's proposal to manage waste to limit public nuisance and urban amenity issues, and the focus on setting out conditions for waste collection at new multi-unit dwellings.
16. Issues created from waste stopping Wellingtonians using public places and amenities need to be addressed, including waste and recycling bins stopping footpath access and piles of waste and recycling at multi-unit dwellings.
17. We note that education remains a critical element of Wellington's overall waste strategy with residents, including students and young professionals who often do not understand Wellington's waste and recycling systems if they have just moved to Wellington, and who often do not have the information to help understand the systems.
18. More work is needed to enable Wellingtonians to take up waste and recycling options, rather than locking in previous restrictions and blacklisting of houses or streets for inappropriate waste and recycling practices.
19. Council should better engage with those households whose waste and recycling practices are inappropriate, to educate these groups.

Wellington City Youth Council
Te Rūnanga Taiohi o te Kaunihera o Pōneke

20. Council's focus on ensuring that there are rules in place for new multi-unit dwellings of 10 and above is important to ensure that denser housing Wellington has adequate waste and recycling facilities.
21. However, we wonder if more of a distinction needs to be made over the types of multi-unit dwellings. High density apartments are likely to require a different waste and recycling approach and strategy compared to medium density townhouses, which may be able to be included in usual waste and recycling collections without issue.
22. We recommend that Council investigate the diverse needs and issues that should be considered between different housing types.
23. We note that the Bylaw is silent about existing multi-unit dwellings, which leaves many residents in an unknown position around their waste and recycling options. Some multi-unit dwellings which do not have waste and recycling facilities are also currently excluded from Council services, meaning that creating more waste is inevitable.
24. Although there may be significant challenges in forming and implementing solutions for multi-unit dwellings, we expect that this area is important to tackle, with the risk that waste volumes will continue expand if the status quo remains.

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
Feedback

Submitter: Jonathan Swan

Suburb: Ngaio

On behalf of: An individual

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Q1. You are making this submission as: Individual

Q2. Would you like to make an oral submission to the Councillors on Thursday, 22 October 2020? Yes

Q3. Multi-unit dwellings The Council is proposing that all new large multi-unit developments (comprising of 10 or more dwellings), provide adequate space for the storage and collection of all waste generated within that development. The Bylaw also requires a related waste management plan to be submitted to the Council prior to building construction. This plan will need to demonstrate, amongst other things, how waste material generated on site will be minimised.

To what extent do you agree or disagree with the proposed Bylaw requirements regulating waste management and minimisation planning for multi-unit dwellings? Definitely agree

Q4. Event waste management The Bylaw seeks to regulate waste management and minimisation when planning a large event of 1000+ people. An event is proposed to include any organised temporary activity of significant scale that is likely to create litter and includes (but is not limited to) an organised outdoor gathering, open-air market, parade, sporting event, protest, festival, concert or celebration. While indoor private functions, indoor performances and regularly occurring recreational activities such as sports events are excluded from this standard, other event organisers will be required to submit an event management plan to the Council for approval prior to the event. The plan would need to demonstrate: (1) how waste generated by the event is to be minimised; (2) the steps that will be taken to maximise the use of reusable systems, recycling and composting; and (3) the proposed method for minimising and capturing litter associated with the event.

To what extent do you agree or disagree with the proposed event waste management and minimisation standards for? Definitely agree

Q5. Construction and demolition waste management The proposed Bylaw and associated Bylaw controls requires all large construction projects (valued at \$2 million+) to consider waste management and minimisation planning as part of their project planning and submit an associated construction site and demolition waste management plan to the Council for approval. Amongst other things, this plan will need to set out: (1) the proposed method of waste management for each type of waste (e.g. reuse, recovery, recycling, disposal); and (2) the proposed method for minimising and capturing litter associated with the project and the building work.

To what extent do you agree or disagree with the proposed requirement to consider waste management and minimisation planning for high value building projects? Definitely agree

**Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
 Feedback**

- Q6. Restricting unaddressed and advertising mail**The Bylaw proposes to formally restrict the deposit of unaddressed mail or advertising mail in letter boxes that are clearly marked with the words “no circulars”, “no junk mail” or “addressed mail only”. There are exceptions for public notices from the government, as well as for different types of information from community organisations and charities.

To what extent do you agree or disagree with this new Definitely agree
 restriction?

- Q7. Waste Operator licensing**The Council has proposed to establish Waste Operator licensing. This would involve mandatory licensing for any person or entity that collects or transports more than 20 tonnes of waste per year within the Wellington City District. Licensing would not apply to individuals who collect or transport waste for personal reasons. The primary purpose of this proposed licensing system is for the Council to collect relevant waste-related data from the private sector and to ensure private waste operators are operating in a manner that is consistent with the Council’s waste-related objectives.

To what extent do you agree or disagree with the Definitely agree
 establishment of waste operator and facility licensing?

- Q8. Proposed Bylaw controls**A new set of bylaw controls is also proposed that may affect how you dispose of your waste and recycling. Amongst other things, these controls regulate waste and recycling servicing and collection times, restrict servicing access for new multi-unit developments (of 10 or more dwellings), restrict servicing access on private roads and on roads where there are operational limitations, restrict the amount of green waste permitted within Council waste receptacles, and prohibit a range of dangerous or potentially hazardous material from being deposited into kerbside waste bags or containers. The controls also introduce a new set of waste separation standards for users of the Southern Landfill.

To what extent do you agree or disagree with the Somewhat agree
 proposed bylaw controls?

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
Feedback

Q9. Are there any other comments you would like to make about the proposed Bylaw and/or the proposed
Bylaw controls?

Kia ora WCC, Comments furthering discussions with Councillor Laurie Foon - July 2020 In regards to recycling changes and adverse affects on the Southern Landfill. I have recently become aware about the changes to WCC recycling coming into force from 20 July 2020. While I think this is a good and necessary step, I believe there has been little or no comm's around the changes, and recycling will still get mixed together and we will add to the overall waste in the Southern Landfill. Over all I see this as a consumer behaviour and packaging problem rather than a waste issue. If we change recycling behaviours and the packaging products come in to be more recyclable - then this would negate the waste issue. Points to make: - Better communications to residents about their obligations to recycling could reduce the over all impact of now non-recyclables going to land fill. - I have discussed this matter with ETA/Griffins, Sanitarium and Pams makers of the now non recyclable products who have all committed to changing their packaging, which is great. They want people to buy their products, and people's buying habits are forcing them to change. Which of course means less waste in our landfill! The packaging collective in Australia - APCO has done a lot of wok to inform manufacturers of their obligations to have clear recycling instructions on packaging. It would be great to see this rolled out in New Zealand as both a point of difference and mandatory requirement. ----- Further advice from Grant Amelung - Gravure Packaging, Petone. Printers of Whittakers and major FMCG packaging: In Aussie, there is clear guidance on which resins brandowners should specify to be compatible with end of life systems, and clear guidance on what isn't allowed. The PREP tool, amongst other documents from APCO help this. In NZ, anything that 'scrunches' into a ball can be returned - a very broad definition, which doesn't go far to change anything really. This prevents end of life markets being developed (because of the shear number of different materials), and doesn't put any onus on brand owners or packaging manufacturers - despite what they claim.... On the rigid plastics side, again there is clear design guidance coming through out of APCO, but in NZ we continue to have no clear design guides that take into account usage, disposal, reuse, etc... Hence, we see a multitude of bottles, containers, colours, label types, label formats, etc.... ----- Ultimately we should be making the packaging producers pay for their poor packaging choices and rewarding those that do use easily recycled packaging. This shouldn't be the onus of the council and ratepayers. Lastly, in 1919, WCC in acted the Milk Supply Act. At the time dairy farmers could make more money selling butter to Britain than milk to the capital. So the WCC took it on themselves to start a dairy factory in Otaki and a suppliers including one in Tory Street. Making sure Wellingtonians had access to to hygienic milk at a good price. The same could be said for recycling, taking ownership of ensuring that we have great recyclable packaging in the the supply chain, so it doesn't become a waste issue. Thanks again for your great work, happy to help where I can to continue to Wellington to be clean, green and the less waste the better! Ngā mihi, Jonathan Swan [REDACTED]

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
 Feedback

Submitter: Rhona Carson
 Suburb: Newtown
 On behalf of: Newtown Residents Association

154

- Q1. You are making this submission as: Newtown Residents' Association
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- Q2. Would you like to make an oral submission to the Councillors on Thursday, 22 October 2020? Yes
-
- Q3. **Multi-unit dwellings**The Council is proposing that all new large multi-unit developments (comprising of 10 or more dwellings), provide adequate space for the storage and collection of all waste generated within that development.The Bylaw also requires a related waste management plan to be submitted to the Council prior to building construction. This plan will need to demonstrate, amongst other things, how waste material generated on site will be minimised.
- To what extent do you agree or disagree with the proposed Bylaw requirements regulating waste management and minimisation planning for multi-unit dwellings? Somewhat disagree
-
- Q4. **Event waste management**The Bylaw seeks to regulate waste management and minimisation when planning a large event of 1000+ people. An event is proposed to include any organised temporary activity of significant scale that is likely to create litter and includes (but is not limited to) an organised outdoor gathering, open-air market, parade, sporting event, protest, festival, concert or celebration.While indoor private functions, indoor performances and regularly occurring recreational activities such as sports events are excluded from this standard, other event organisers will be required to submit an event management plan to the Council for approval prior to the event.The plan would need to demonstrate: (1) how waste generated by the event is to be minimised; (2) the steps that will be taken to maximise the use of reusable systems, recycling and composting; and (3) the proposed method for minimising and capturing litter associated with the event.
- To what extent do you agree or disagree with the proposed event waste management and minimisation standards for Somewhat agree
-
- Q5. **Construction and demolition waste management**The proposed Bylaw and associated Bylaw controls requires all large construction projects (valued at \$2 million+) to consider waste management and minimisation planning as part of their project planning and submit an associated construction site and demolition waste management plan to the Council for approval.Amongst other things, this plan will need to set out: (1) the proposed method of waste management for each type of waste (e.g. reuse, recovery, recycling, disposal); and (2) the proposed method for minimising and capturing litter associated with the project and the building work.
- To what extent do you agree or disagree with the proposed requirement to consider waste management and minimisation planning for high value building projects? Definitely agree
-

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
Feedback

- Q6. Restricting unaddressed and advertising mail The Bylaw proposes to formally restrict the deposit of unaddressed mail or advertising mail in letter boxes that are clearly marked with the words "no circulars", "no junk mail" or "addressed mail only". There are exceptions for public notices from the government, as well as for different types of information from community organisations and charities.

To what extent do you agree or disagree with this new restriction? Definitely agree

- Q7. Waste Operator licensing The Council has proposed to establish Waste Operator licensing. This would involve mandatory licensing for any person or entity that collects or transports more than 20 tonnes of waste per year within the Wellington City District. Licensing would not apply to individuals who collect or transport waste for personal reasons. The primary purpose of this proposed licensing system is for the Council to collect relevant waste-related data from the private sector and to ensure private waste operators are operating in a manner that is consistent with the Council's waste-related objectives.

To what extent do you agree or disagree with the establishment of waste operator and facility licensing? Definitely agree

- Q8. Proposed Bylaw controls A new set of bylaw controls is also proposed that may affect how you dispose of your waste and recycling. Amongst other things, these controls regulate waste and recycling servicing and collection times, restrict servicing access for new multi-unit developments (of 10 or more dwellings), restrict servicing access on private roads and on roads where there are operational limitations, restrict the amount of green waste permitted within Council waste receptacles, and prohibit a range of dangerous or potentially hazardous material from being deposited into kerbside waste bags or containers. The controls also introduce a new set of waste separation standards for users of the Southern Landfill.

To what extent do you agree or disagree with the proposed bylaw controls? Somewhat agree

- Q9. Are there any other comments you would like to make about the proposed Bylaw and/or the proposed Bylaw controls?

We 'somewhat disagree' with 12. Multi Unit developments. This because of this statement "12.1 The owner and/or the manager of a multi-unit development must make adequate provision for the management of all waste, recycling and organic waste generated within the premises. This includes arrangements for the regular collection of waste to the satisfaction of Council...." This implies that the Council contractors aren't going to collect the waste and recycling, a service which is available to other residents. We disagree with residents in multi unit developments being disadvantaged like this. We also foresee complications when the multi units are in private ownership and there is no overall owner or manager to take responsibility. Waste Management at Events - We have been involved with this for many years because of our long association with Newtown Festival. We strongly support WCC bylaws to enforce appropriate waste minimisation, but don't think this proposal goes far enough. "We do not understand why indoor events are excluded from regulation. We recommend that they should be required to follow the same regulations as outdoor events - waste is waste wherever it is generated. "We support the requirement that event managers produce waste minimisation plans before an event, for Council approval, and that event managers be required to follow these plans during the event. We also support events being encouraged to undertake a post-event waste analysis report. "We recommend that event managers be required to submit waste management plans 90 days out for events of 10,000+ attendees, and 60 days out for events of 1000+ people. Thirty working days does not allow sufficient time to ensure that appropriate planning and sourcing of required infrastructure has taken place ahead of the event. "We recommend that plans be required to consider the waste hierarchy, so that waste prevention and reduction, and reuse of resources is prioritised over recycling. "We recommend WCC work with those experienced in delivering reuse systems to create best practice guidance on implementing reusables at events in order to support event managers to consider these systems when creating their event waste management plan.

**Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
 Feedback**

Submitter: Wade Martelletti
 Suburb: Churton Park
 On behalf of: An individual

33

- Q1. You are making this submission as: Individual
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- Q2. Would you like to make an oral submission to the Councillors on Thursday, 22 October 2020? Yes
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- Q3. **Multi-unit dwellings**The Council is proposing that all new large multi-unit developments (comprising of 10 or more dwellings), provide adequate space for the storage and collection of all waste generated within that development.The Bylaw also requires a related waste management plan to be submitted to the Council prior to building construction. This plan will need to demonstrate, amongst other things, how waste material generated on site will be minimised.
- To what extent do you agree or disagree with the proposed Bylaw requirements regulating waste management and minimisation planning for multi-unit dwellings? Somewhat agree
-
- Q4. **Event waste management**The Bylaw seeks to regulate waste management and minimisation when planning a large event of 1000+ people. An event is proposed to include any organised temporary activity of significant scale that is likely to create litter and includes (but is not limited to) an organised outdoor gathering, open-air market, parade, sporting event, protest, festival, concert or celebration.While indoor private functions, indoor performances and regularly occurring recreational activities such as sports events are excluded from this standard, other event organisers will be required to submit an event management plan to the Council for approval prior to the event.The plan would need to demonstrate: (1) how waste generated by the event is to be minimised; (2) the steps that will be taken to maximise the use of reusable systems, recycling and composting; and (3) the proposed method for minimising and capturing litter associated with the event.
- To what extent do you agree or disagree with the proposed event waste management and minimisation standards for Definitely agree
-
- Q5. **Construction and demolition waste management**The proposed Bylaw and associated Bylaw controls requires all large construction projects (valued at \$2 million+) to consider waste management and minimisation planning as part of their project planning and submit an associated construction site and demolition waste management plan to the Council for approval.Amongst other things, this plan will need to set out: (1) the proposed method of waste management for each type of waste (e.g. reuse, recovery, recycling, disposal); and (2) the proposed method for minimising and capturing litter associated with the project and the building work.
- To what extent do you agree or disagree with the proposed requirement to consider waste management and minimisation planning for high value building projects? Definitely agree
-

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
Feedback

- Q6. Restricting unaddressed and advertising mail The Bylaw proposes to formally restrict the deposit of unaddressed mail or advertising mail in letter boxes that are clearly marked with the words "no circulars", "no junk mail" or "addressed mail only". There are exceptions for public notices from the government, as well as for different types of information from community organisations and charities.

To what extent do you agree or disagree with this new restriction? Definitely agree

- Q7. Waste Operator licensing The Council has proposed to establish Waste Operator licensing. This would involve mandatory licensing for any person or entity that collects or transports more than 20 tonnes of waste per year within the Wellington City District. Licensing would not apply to individuals who collect or transport waste for personal reasons. The primary purpose of this proposed licensing system is for the Council to collect relevant waste-related data from the private sector and to ensure private waste operators are operating in a manner that is consistent with the Council's waste-related objectives.

To what extent do you agree or disagree with the establishment of waste operator and facility licensing? Definitely agree

- Q8. Proposed Bylaw controls A new set of bylaw controls is also proposed that may affect how you dispose of your waste and recycling. Amongst other things, these controls regulate waste and recycling servicing and collection times, restrict servicing access for new multi-unit developments (of 10 or more dwellings), restrict servicing access on private roads and on roads where there are operational limitations, restrict the amount of green waste permitted within Council waste receptacles, and prohibit a range of dangerous or potentially hazardous material from being deposited into kerbside waste bags or containers. The controls also introduce a new set of waste separation standards for users of the Southern Landfill.

To what extent do you agree or disagree with the proposed bylaw controls? Definitely agree

- Q9. Are there any other comments you would like to make about the proposed Bylaw and/or the proposed Bylaw controls?

We must recycle everything that is possible.

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
Feedback

Submitter: Richard Moore	160 <input type="checkbox"/>
Suburb: N/A	
On behalf of: Poly Palace	

- Q1. You are making this submission as:** Poly Palace (MegaVision Ltd)
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- Q2. Would you like to make an oral submission to the Councillors on Thursday, 22 October 2020?** Yes
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- Q3. Multi-unit dwellings**The Council is proposing that all new large multi-unit developments (comprising of 10 or more dwellings), provide adequate space for the storage and collection of all waste generated within that development.The Bylaw also requires a related waste management plan to be submitted to the Council prior to building construction. This plan will need to demonstrate, amongst other things, how waste material generated on site will be minimised.
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- To what extent do you agree or disagree with the proposed event waste management and minimisation standards for Definitely agree
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- Q5. Construction and demolition waste management**The proposed Bylaw and associated Bylaw controls requires all large construction projects (valued at \$2 million+) to consider waste management and minimisation planning as part of their project planning and submit an associated construction site and demolition waste management plan to the Council for approval.Amongst other things, this plan will need to set out: (1) the proposed method of waste management for each type of waste (e.g. reuse, recovery, recycling, disposal); and (2) the proposed method for minimising and capturing litter associated with the project and the building work.
- To what extent do you agree or disagree with the proposed requirement to consider waste management and minimisation planning for high value building projects? Definitely agree
-

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
Feedback

- Q6. Restricting unaddressed and advertising mail The Bylaw proposes to formally restrict the deposit of unaddressed mail or advertising mail in letter boxes that are clearly marked with the words "no circulars", "no junk mail" or "addressed mail only". There are exceptions for public notices from the government, as well as for different types of information from community organisations and charities.

To what extent do you agree or disagree with this new restriction? Definitely agree

- Q7. Waste Operator licensing The Council has proposed to establish Waste Operator licensing. This would involve mandatory licensing for any person or entity that collects or transports more than 20 tonnes of waste per year within the Wellington City District. Licensing would not apply to individuals who collect or transport waste for personal reasons. The primary purpose of this proposed licensing system is for the Council to collect relevant waste-related data from the private sector and to ensure private waste operators are operating in a manner that is consistent with the Council's waste-related objectives.

To what extent do you agree or disagree with the establishment of waste operator and facility licensing? Definitely disagree

- Q8. Proposed Bylaw controls A new set of bylaw controls is also proposed that may affect how you dispose of your waste and recycling. Amongst other things, these controls regulate waste and recycling servicing and collection times, restrict servicing access for new multi-unit developments (of 10 or more dwellings), restrict servicing access on private roads and on roads where there are operational limitations, restrict the amount of green waste permitted within Council waste receptacles, and prohibit a range of dangerous or potentially hazardous material from being deposited into kerbside waste bags or containers. The controls also introduce a new set of waste separation standards for users of the Southern Landfill.

To what extent do you agree or disagree with the proposed bylaw controls? Definitely agree

- Q9. Are there any other comments you would like to make about the proposed Bylaw and/or the proposed Bylaw controls?

Ban non HBCB EPS from landfill. Ban resale of HBCD Polystyrene that cannot be reused or recycled and must go to class1 landfill so as to prevent the fiasco of supposedly environmentally conscious and environmental award winning Centerports cold-store demolition HBCD polystyrene from being sold for \$1 bids on TradeMe and given away on the free advertiser in the regions fish and chip shops by Choops firewood (Quality Demolition) instead of being landfilled. So much for environmental laws.... We just dont understand what should be landfilled and what shouldn't so if it can't be done properly it shouldn't be done at all. This bylaw should ban EPS from the regions landfills. Instead put it in infrastructure in the built environment like the 100% recycled polystyrene used in Mackay's to Peka Peka Expressway or Frame Apartments. (The latter diverted 300m3 of EPS otherwise destined for landfill saving ?\$ of landfill space and a \$33000 sale of 100% recycled EPS as light rigid fill saved the construction project \$40000 on the alternative fill material. Less landfill and cheaper infrastructure construction. Exactly what Wellington needs. What Wellington doesn't need is the new biggest landfill ever cosited with its current one but in the absence of innovation like this that is all we will get# Welcome to Wellington the coolest little landfill capital in the world, with 3 class1 landfills within 40 minutes drive of the CBD. Such a waste!

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
Feedback

Submitter: Vanessa Rushton Suburb: N/A On behalf of: Wellington Waste Managers	157
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Q1. You are making this submission as: Wellington Waste Managers

Q2. Would you like to make an oral submission to the Councillors on Thursday, 22 October 2020? Yes

Q3. **Multi-unit dwellings**The Council is proposing that all new large multi-unit developments (comprising of 10 or more dwellings), provide adequate space for the storage and collection of all waste generated within that development.The Bylaw also requires a related waste management plan to be submitted to the Council prior to building construction. This plan will need to demonstrate, amongst other things, how waste material generated on site will be minimised.

To what extent do you agree or disagree with the proposed Bylaw requirements regulating waste management and minimisation planning for multi-unit dwellings? Somewhat agree

Q4. **Event waste management**The Bylaw seeks to regulate waste management and minimisation when planning a large event of 1000+ people. An event is proposed to include any organised temporary activity of significant scale that is likely to create litter and includes (but is not limited to) an organised outdoor gathering, open-air market, parade, sporting event, protest, festival, concert or celebration.While indoor private functions, indoor performances and regularly occurring recreational activities such as sports events are excluded from this standard, other event organisers will be required to submit an event management plan to the Council for approval prior to the event.The plan would need to demonstrate: (1) how waste generated by the event is to be minimised; (2) the steps that will be taken to maximise the use of reusable systems, recycling and composting; and (3) the proposed method for minimising and capturing litter associated with the event.

To what extent do you agree or disagree with the proposed event waste management and minimisation standards for Somewhat agree

Q5. **Construction and demolition waste management**The proposed Bylaw and associated Bylaw controls requires all large construction projects (valued at \$2 million+) to consider waste management and minimisation planning as part of their project planning and submit an associated construction site and demolition waste management plan to the Council for approval.Amongst other things, this plan will need to set out: (1) the proposed method of waste management for each type of waste (e.g. reuse, recovery, recycling, disposal); and (2) the proposed method for minimising and capturing litter associated with the project and the building work.

To what extent do you agree or disagree with the proposed requirement to consider waste management and minimisation planning for high value building projects? Somewhat agree

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
Feedback

- Q6. Restricting unaddressed and advertising mail The Bylaw proposes to formally restrict the deposit of unaddressed mail or advertising mail in letter boxes that are clearly marked with the words "no circulars", "no junk mail" or "addressed mail only". There are exceptions for public notices from the government, as well as for different types of information from community organisations and charities.

To what extent do you agree or disagree with this new restriction? Definitely agree

- Q7. Waste Operator licensing The Council has proposed to establish Waste Operator licensing. This would involve mandatory licensing for any person or entity that collects or transports more than 20 tonnes of waste per year within the Wellington City District. Licensing would not apply to individuals who collect or transport waste for personal reasons. The primary purpose of this proposed licensing system is for the Council to collect relevant waste-related data from the private sector and to ensure private waste operators are operating in a manner that is consistent with the Council's waste-related objectives.

To what extent do you agree or disagree with the establishment of waste operator and facility licensing? Somewhat agree

- Q8. Proposed Bylaw controls A new set of bylaw controls is also proposed that may affect how you dispose of your waste and recycling. Amongst other things, these controls regulate waste and recycling servicing and collection times, restrict servicing access for new multi-unit developments (of 10 or more dwellings), restrict servicing access on private roads and on roads where there are operational limitations, restrict the amount of green waste permitted within Council waste receptacles, and prohibit a range of dangerous or potentially hazardous material from being deposited into kerbside waste bags or containers. The controls also introduce a new set of waste separation standards for users of the Southern Landfill.

To what extent do you agree or disagree with the proposed bylaw controls? Somewhat agree

- Q9. Are there any other comments you would like to make about the proposed Bylaw and/or the proposed Bylaw controls?

Kia ora, Thank you for the opportunity to submit on the proposed changes to the waste bylaw. We have submitted as part of the joint submission with the Sustainability Trust, Kaicycle and The Rubbish Trip, but wanted to submit directly as well. We look forward to making an oral submission also, to share some of our on the ground experiences working to minimise waste at events across the region. These are our topline recommendations: We support the requirement that event managers produce waste management plans (or, better yet, 'zero waste plans') before an event, for Council approval, and that event managers be required to follow these plans during the event. We also support events being encouraged or required to undertake a post-event waste analysis report. We recommend that event managers be required to submit waste management plans 90 days out for events of 10,000+ attendees, and 60 days out for events of 1000+ people. Thirty working days does not allow sufficient time to ensure that appropriate planning and sourcing of required infrastructure has taken place ahead of the event. If events aren't required to plan ahead they may not be able to access and book in required infrastructure (such as bins/skip bins) and human resource (including volunteers) needed to sufficiently manage their waste and deliver waste minimisation practices. From WWM's experience, when an event has contacted us within the month leading up to their event, an effective waste plan has not been able to be implemented. We recommend that plans be required to consider the waste hierarchy, so that waste prevention and reduction, and reuse of resources is prioritised over recycling. We recommend WCC work with those experienced in delivering reuse systems to create best practice guidance on implementing reusables at events in order to support event managers to consider these systems when creating their event waste management plan. We do not support the blanket exclusion of indoor events from regulation. Additionally, we strongly support this full set of recommendations, as included in the joint submission: We agree that, as a controlled environment, events are a good opportunity to maximise waste segregation and diversion, while offering an opportunity to

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:

Feedback

Introduce a wide audience to waste reducing behaviours. We support the requirement that event managers produce waste management plans (or, better yet, 'zero waste plans') before an event, for Council approval, and that event managers be required to follow these plans during the event. We also support events being encouraged to undertake a post-event waste analysis report. We agree with the proposed one year delay before the provisions' commencement to allow for regional collaboration to establish guidance and resourcing to support event managers to deliver zero waste events, and support the collection and analysis of the waste data provided. The Council must ensure organisations such as Wellington Waste Managers, Para Kore, and Organic Wealth are included in this process. We recommend amending the definition of "Event" in cl 6 of the Bylaw to be focused on defining an event, rather than defining the types of events that are or are not regulated by the bylaw. For example, an event should not be defined by its size or by exclusions such as whether it is indoors or outdoors. Rather than shifting these elements to cl 13 of the bylaw, we recommend shifting them into the Controls. This will allow flexibility to expand the scope of events in the future through a Council resolution rather than having to amend the bylaw. We recommend that smaller events (between 100-1000 attendees) be required to submit a zero waste plan, even if this plan won't require Council approval. This will ensure all event organisers receive the same message that waste planning and minimisation is important, and give the Council the opportunity to share and communicate the resources available in Wellington to help event organisers minimise waste. We do not support the blanket exclusion of indoor events from regulation. Council should be pushing indoor events to be more ambitious in their waste minimisation. Many of these indoor venues receive Council funding or are Council operated and have greater access than outdoor venues to the kinds of facilities that support waste minimisation. They should be demonstrating best practice. We recommend that event managers be required to submit waste management plans 90 days out for events of 10,000+ attendees, and 60 days out for events of 1000+ people. Thirty working days does not allow sufficient time to ensure that appropriate planning has taken place ahead of the event. We recommend that plans be required to consider the waste hierarchy, so that waste prevention and reduction, and reuse of resources is prioritised over recycling. We also recommend renaming the plans. An "event waste management plan" sends a non-aspirational message from the Council to event managers that systems geared towards the bottom of the waste hierarchy (recycling and reducing litter) are sufficient. More exciting names that would better communicate what the Council is trying to achieve would be "Zero Waste Event Plan" or "event waste minimisation plan". We recommend cl 13(d) be amended to include reference to the equipment needed to operate effective waste prevention and reduction systems at events, such as reuse systems that require sterilising/washing facilities. This is important, particularly given the focus on outdoor events. Serious consideration should be given to whether outdoor events should be permitted without a plan in place to ensure washing facilities are available that enable food vendors to offer reusables (given many of those vendors at a busy, outdoor event won't have those facilities themselves, especially if they are operating from trucks and stalls). We recommend WCC work with those experienced in delivering reuse systems to create best practice guidance on implementing reusables at events in order to support event managers to consider these systems when creating their event waste management plan. We note that Council has a vital role in supporting and investing in the infrastructure necessary for scalable reuse systems, including washing and sterilisation equipment and reverse logistics. We recommend amending cl 13.4 to automatically require all event managers who submit a waste management plan to also submit a post-event waste analysis report. Clause 14 should also be amended to specify that waste analysis reports include an evaluative breakdown of what worked well, what didn't, and notes on what improvements will be implemented the next time the event occurs. We note that the use of the phrase "diverted" in cl 13.4 is outdated and restrictive in light of the rapid growth of event-based waste prevention and reduction systems (such as reuse systems). Diversion is useful for assessing waste separated and sorted for recycling and composting, but doesn't capture waste streams that were avoided entirely. We recommend that alongside accounting for waste diverted, event managers be required to account for any practices adopted that prevented or reduced waste. For example, number of serves in reusable serviceware or other measures deemed appropriate. For events that reoccur (e.g. annually), a requirement to conduct post-event waste analysis reports and waste audits will enable event managers to track progress in waste reduction each time the event reoccurs. We note that enforcement will be critical to success. Who will receive and check plans at Council and what will the criteria be for approval? Who will monitor that the plans are being delivered? Under what circumstances will the Council require an event manager to provide a waste analysis report? Please let us know if we can play a role in enforcement. Ngā mihi nui Vanessa Rushion, Chairperson Wellington Waste Managers

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
Feedback

Submitter: Hannah Blumhardt

Suburb: N/A

On behalf of: The Rubbish Trip, Sustainability
Trust, Wellington Waste Managers and Kaicycle.

141

Q1. You are making this submission as: This is a JOINT submission by: The Rubbish Trip, Sustainability
Trust, Wellington Waste Managers, Kaicycle

Q2. Would you like to make an oral submission to the Councillors on Thursday, 22 October 2020? Yes

Q3. Multi-unit dwellingsThe Council is proposing that all new large multi-unit developments (comprising of 10 or more dwellings), provide adequate space for the storage and collection of all waste generated within that development.The Bylaw also requires a related waste management plan to be submitted to the Council prior to building construction. This plan will need to demonstrate, amongst other things, how waste material generated on site will be minimised.

To what extent do you agree or disagree with the proposed Bylaw requirements regulating waste management and minimisation planning for multi-unit dwellings? Somewhat agree

Q4. Event waste managementThe Bylaw seeks to regulate waste management and minimisation when planning a large event of 1000+ people. An event is proposed to include any organised temporary activity of significant scale that is likely to create litter and includes (but is not limited to) an organised outdoor gathering, open-air market, parade, sporting event, protest, festival, concert or celebration.While indoor private functions, indoor performances and regularly occurring recreational activities such as sports events are excluded from this standard, other event organisers will be required to submit an event management plan to the Council for approval prior to the event.The plan would need to demonstrate: (1) how waste generated by the event is to be minimised; (2) the steps that will be taken to maximise the use of reusable systems, recycling and composting; and (3) the proposed method for minimising and capturing litter associated with the event.

To what extent do you agree or disagree with the proposed event waste management and minimisation standards for Somewhat agree

Q5. Construction and demolition waste managementThe proposed Bylaw and associated Bylaw controls requires all large construction projects (valued at \$2 million+) to consider waste management and minimisation planning as part of their project planning and submit an associated construction site and demolition waste management plan to the Council for approval.Amongst other things, this plan will need to set out: (1) the proposed method of waste management for each type of waste (e.g. reuse, recovery, recycling, disposal); and (2) the proposed method for minimising and capturing litter associated with the project and the building work.

To what extent do you agree or disagree with the proposed requirement to consider waste management and minimisation planning for high value building projects? Somewhat agree

**Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
 Feedback**

- Q6. Restricting unaddressed and advertising mail**The Bylaw proposes to formally restrict the deposit of unaddressed mail or advertising mail in letter boxes that are clearly marked with the words “no circulars”, “no junk mail” or “addressed mail only”. There are exceptions for public notices from the government, as well as for different types of information from community organisations and charities.

To what extent do you agree or disagree with this new restriction? Definitely agree

- Q7. Waste Operator licensing**The Council has proposed to establish Waste Operator licensing. This would involve mandatory licensing for any person or entity that collects or transports more than 20 tonnes of waste per year within the Wellington City District. Licensing would not apply to individuals who collect or transport waste for personal reasons. The primary purpose of this proposed licensing system is for the Council to collect relevant waste-related data from the private sector and to ensure private waste operators are operating in a manner that is consistent with the Council’s waste-related objectives.

To what extent do you agree or disagree with the establishment of waste operator and facility licensing? Somewhat agree

- Q8. Proposed Bylaw controls**A new set of bylaw controls is also proposed that may affect how you dispose of your waste and recycling. Amongst other things, these controls regulate waste and recycling servicing and collection times, restrict servicing access for new multi-unit developments (of 10 or more dwellings), restrict servicing access on private roads and on roads where there are operational limitations, restrict the amount of green waste permitted within Council waste receptacles, and prohibit a range of dangerous or potentially hazardous material from being deposited into kerbside waste bags or containers. The controls also introduce a new set of waste separation standards for users of the Southern Landfill.

To what extent do you agree or disagree with the proposed bylaw controls? Somewhat agree

- Q9. Are there any other comments you would like to make about the proposed Bylaw and/or the proposed Bylaw controls?**

**** General comments about the Proposed Bylaw and Controls**** We welcome and support this review and update of the waste-related provisions of the bylaw. We recognise that bylaws are an important regulatory tool for WCC and that the current bylaw does not encourage waste minimisation and a decrease in waste disposal. We strongly support the proposal to include Control-making powers in cl 7 of the bylaw as this will greatly increase Council’s flexibility to respond to changes in the waste and recycling sector and the waste minimisation/zero waste landscape. We welcome that this review of the bylaw is regionally coordinated and that the proposals, once approved, will be replicated across the regions, which will enhance consistency. We urge Council to keep in mind how the bylaw and controls could impact on small-scale waste operations (including community-led and non-profit operations), and ensure the bylaw and controls support these small-scale operations and their constant improvement of practices, instead of making it more difficult for them to function. Small-scale, community-based waste operations have a multitude of positive outcomes, including reduced transport emissions and more jobs created. We are disappointed by the lack of ambition in this bylaw and the associated controls, as currently drafted, which fail to capture the growing global and local acceptance of zero waste and circular economy theory and practice. We do not believe that the nature of the proposals make the most of this once in a decade opportunity to review and update the bylaw, nor do they adequately respond to the urgent need to turn around Wellington’s ever-increasing waste to landfill. We note that the Council has declared a climate emergency. Waste minimisation, including reducing and diverting food waste from landfill, is critical for responding to the climate emergency and achieving the Te Atakura blueprint to make Wellington City a zero carbon capital. We recommend that Council clearly articulate a vision for a zero waste/waste-free Wellington (and work collaboratively for a zero waste/waste-free Greater Wellington region) and devise bylaws that help advance these goals. The current Waste Management and Minimisation Plan (from 2017) is inadequate

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and needs to be revisited and updated. Despite this, the proposed bylaw and controls don't get us much closer to achieving even some of the baseline goals of the current WMMP. We recommend that the Council embrace the language of waste minimisation, zero waste and the circular economy in the proposed bylaw and controls. At present, the proposals focus excessively on "diversion", "collection" and "management" - all concepts and systems associated with the bottom of the waste hierarchy. The proposals miss the opportunity to encourage or require waste prevention, reduction, minimisation and reuse. We acknowledge that these topics feature in the proposed construction & demolition (C&D) provisions and we welcome these, but don't understand why they aren't raised throughout the bylaw and controls. We recommend that the Council take advantage of the scope of the cl 7 Control-making powers and propose rules that cover a broader range of matters. For example: ● Propose rules pertaining to the size or type of receptacles. We believe Council should consider restricting the capacity of household waste receptacles (as per Taupō that restricts household waste receptacles to 120 litres) to reduce waste to landfill and increase waste separation and recycling. We also seek clarity on whether Council will be amending the rules in the Controls to reflect the recent recommendations of the report by WasteMINZ around standardising kerbside rubbish and recycling collections? ● Propose rules for waste collection services that could increase waste separation and recycling (at present the rules in this area are very focused on mitigating public nuisance and litter). For example, Council could require waste collectors and operators to shift to providing a weekly collection service but alternate waste and recycling each week so waste collections become fortnightly. Furthermore, we would like to see rules that require commercial waste collectors to provide a recycling collection service to householders as a criteria for licensing. This is needed to ensure that those householders who do not have access to a Council-provided waste and recycling collection still have access to recycling collection services. We are disappointed that the bylaws do not mandate the separation and separate collection of recyclables for all premises. It's 2020 - we cannot wait another ten years to achieve 100% separation of recyclables in New Zealand's capital city. We recommend adding clauses and rules that place a greater focus on services for organic waste. We acknowledge the proposals' attention to increasing waste separation and recycling collections. However, we don't understand the lack of attention to organic waste, which constitutes the single biggest proportion of the average Wellingtonian's household rubbish bin. Diverting food waste from landfill towards localised composting solutions is one of Wellington's biggest opportunities to address both waste and GHG emissions. We are blessed with leaders in this field in the form of Kaicycle and Capital Compost. Harnessing the potential of organic 'waste' in Wellington could set us apart as a visionary model for other urban areas to follow. We note that services for organic waste may not necessarily look like collections and could also include local drop-off points and professionally-run, community-scale composts. We recommend that cl 8 more clearly distinguishes obligations for residential and commercial premises. We believe insufficient attention is given to commercial waste in the city. We note the sector-based clauses for events and C&D and we recommend that a new clause is inserted that focuses on the hospitality industry. Hospitality offers a key opportunity for waste reduction as well as introducing waste reducing behaviours to a wider audience. If done well, this could offer cost savings for the hospitality industry. We recommend that the bylaw and controls set some rules and expectations around Council procurement practices to minimise waste at Council offices, council run events, and council building projects. We recommend that the bylaw strengthens the provisions around enforcement and clarifies the criteria against which plans will be approved or evaluations of plans will be required. We note that alongside a lack of clear rules and regulations, there is an ongoing need for investment in activities and infrastructure for resource processing and waste minimisation, including initiatives led by communities and small businesses. We see a clear opportunity for investment in systems geared around reuse, such as resource recovery centres, washing and sterilisation infrastructure and reverse logistics. These systems would reduce waste in daily city life generally, as well as at events, and would generate local, meaningful jobs. We note that new rules and regulations must be accompanied by non-regulatory guidance, such as community education, guidelines and the provision of information about appropriate operational practices. There will also be the need for clear communications to all those impacted by the changes. The guidance and communications need to be developed alongside zero waste organisations and businesses already demonstrating best practice. We query definitions given in Part A and would welcome further explanation: ● The definition of 'household waste' does not include: prohibited waste, hazardous waste, liquid waste, or construction and demolition waste. Does this limit what the Council can impose in terms of controls under the bylaw? ● Definitions are given for all waste streams. Why is the definition of 'organic waste' the only one that is defined in relation to Clause 7? ** Questions from the submission form** *Q. Multi-unit dwellings* We support the requirement that managers/owners of multi-unit developments make adequate provision for waste and recycling facilities and collection services. We strongly support the requirement that owners/managers of a planned multi-unit development submit a waste management plan before construction begins. If waste is considered before construction,

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there's far greater potential to ensure systems maximise waste minimisation (rather than trying to retrofit systems after the fact). We recommend that the plans are called "waste minimisation and management plans" to capture Council's expectation that multi-unit developments will achieve waste minimisation outcomes. We recommend that plans be required to consider the waste hierarchy. We note that the expectations for multi-unit developments are very focused on storage of waste and recycling for collection and removal, which limits the scope for waste minimising activity. One key area of opportunity for future multi-unit developments is organic waste. Given the growing concern to divert organic material from landfill towards beneficial use, and to increase food security, it would be good to see an expectation that future multi-unit developments set aside space (outside or in basement area) to compost/vermicompost organic material produced on site. This could link in with the goal of increasing community compost hubs around the city and be incorporated into pre-construction waste management plans. We recommend that Council provide guidance, including best practice, so that managers and owners understand what "adequate provision" for management of waste, recycling and organic waste looks like. In this guidance, there could be potential to align with Homestar ratings. Furthermore, we note that managers may sometimes be volunteers with limited time, resources or expertise. If managers are not paid for their role, it may be more appropriate to place this responsibility with the owner(s) of the development. We query why Council is proposing to withdraw the provision of waste and recycling collection services for new multi-unit developments? *Q. Event waste management* We agree that, as a controlled environment, events are a good opportunity to maximise waste segregation and diversion, while offering an opportunity to introduce a wide audience to waste reducing behaviours. We support the requirement that event managers produce waste management plans (or, better yet, 'zero waste plans') before an event, for Council approval, and that event managers be required to follow these plans during the event. We also support events being encouraged to undertake a post-event waste analysis report. We agree with the proposed one year delay before the provisions' commencement to allow for regional collaboration to establish guidance and resourcing to support event managers to deliver zero waste events, and support the collection and analysis of the waste data provided. The Council must ensure organisations such as Wellington Waste Managers, Para Kore, and Organic Wealth are included in this process. We recommend amending the definition of "Event" in cl 6 of the Bylaw to be focused on defining an event, rather than defining the types of events that are or are not regulated by the bylaw. For example, an event should not be defined by its size or by exclusions such as whether it is indoors or outdoors. Rather than shifting these elements to cl 13 of the bylaw, we recommend shifting them into the Controls. This will allow flexibility to expand the scope of events in the future through a Council resolution rather than having to amend the bylaw. We recommend that smaller events (between 100-1000 attendees) be required to submit a zero waste plan, even if this plan won't require Council approval. This will ensure all event organisers receive the same message that waste planning and minimisation is important, and give the Council the opportunity to share and communicate the resources available in Wellington to help event organisers minimise waste. We do not support the blanket exclusion of indoor events from regulation. Council should be pushing indoor events to be more ambitious in their waste minimisation. Many of these indoor venues receive Council funding or are Council operated and have greater access than outdoor venues to the kinds of facilities that support waste minimisation. They should be demonstrating best practice. We recommend that event managers be required to submit waste management plans 90 days out for events of 10,000+ attendees, and 60 days out for events of 1000+ people. Thirty working days does not allow sufficient time to ensure that appropriate planning has taken place ahead of the event. We recommend that plans be required to consider the waste hierarchy, so that waste prevention and reduction, and reuse of resources is prioritised over recycling. We also recommend renaming the plans. An "event waste management plan" sends a non-aspirational message from the Council to event managers that systems geared towards the bottom of the waste hierarchy (recycling and reducing litter) are sufficient. More exciting names that would better communicate what the Council is trying to achieve would be "Zero Waste Event Plan" or "event waste minimisation plan". We recommend cl 13(d) be amended to include reference to the equipment needed to operate effective waste prevention and reduction systems at events, such as reuse systems that require sterilising/washing facilities. This is important, particularly given the focus on outdoor events. Serious consideration should be given to whether outdoor events should be permitted without a plan in place to ensure washing facilities are available that enable food vendors to offer reusables (given many of those vendors at a busy, outdoor event won't have those facilities themselves, especially if they are operating from trucks and stalls). We recommend WCC work with those experienced in delivering reuse systems to create best practice guidance on implementing reusables at events in order to support event managers to consider these systems when creating their event waste management plan. We note that Council has a vital role in supporting and investing in the infrastructure necessary for scalable reuse systems, including

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washing and sterilisation equipment and reverse logistics. We recommend amending cl 13.4 to automatically require all event managers who submit a waste management plan to also submit a post-event waste analysis report. Clause 14 should also be amended to specify that waste analysis reports include an evaluative breakdown of what worked well, what didn't, and notes on what improvements will be implemented the next time the event occurs. We note that the use of the phrase "diverted" in cl 13.4 is outdated and restrictive in light of the rapid growth of event-based waste prevention and reduction systems (such as reuse systems). Diversion is useful for assessing waste separated and sorted for recycling and composting, but doesn't capture waste streams that were avoided entirely. We recommend that alongside accounting for waste diverted, event managers be required to account for any practices adopted that prevented or reduced waste. For example, number of serves in reusable serviceware or other measures deemed appropriate. For events that reoccur (e.g. annually), a requirement to conduct post-event waste analysis reports and waste audits will enable event managers to track progress in waste reduction each time the event reoccurs. We note that enforcement will be critical to success. Who will receive and check plans at Council and what will the criteria be for approval? Who will monitor that the plans are being delivered? Under what circumstances will the Council require an event manager to provide a waste analysis report? *Q. Construction and demolition waste management* We agree that a massive opportunity exists to divert construction and demolition (C&D) waste from landfill and that regulation is needed to achieve this. We agree that the proposed changes to the bylaw and the proposed Controls will complement Central Government's decision to increase and expand the landfill levy, which will make landfilling C&D waste more expensive. We support requiring any person applying for building work consent to submit a construction site and demolition waste management plan for approval by Council before the building work can start. We recommend that the plans should be called "waste minimisation and management plans" to better capture the Council's goal of minimising C&D waste to landfill, not simply managing it differently. We recommend that plans be required to consider the waste hierarchy, so that waste prevention and reduction and reuse of resources is prioritised over recycling. With recycling opportunities in the city currently limited, reuse is a real opportunity in relation to refurbishment projects. We recommend that cl 14 be amended to make clear that "building work" includes refurbishment projects. We query the decision to require waste management plans be submitted only for building work valued at \$2m or more - how was this figure decided? We recommend that smaller projects be required to submit a plan, even if this plan doesn't require Council approval. This will ensure all contractors are receiving the same message from Council that waste planning and minimisation is important. We support the goals of clauses 14.4 and 14.5 to gather data on waste generation and minimisation and resource recovery during C&D projects, and encourage a post-build evaluation of the success in implementing the waste management plan and any cost savings. We note that as drafted it is unclear under what circumstances Council might require principal contractors to undertake these activities. We recommend that these activities are compulsory for all building work that required a waste management plan to be submitted for Council approval. We note that enforcement will be critical to success. Who will receive and check plans at Council and what will the criteria be for approval? Who will monitor that the plans are being delivered? We note that Council must make plans to divert funding from its allocation of the waste disposal levy revenue towards infrastructure to support resource recovery and waste minimisation in the C&D sector. *Q. Restricting unaddressed and advertising mail* DEFINITELY AGREE *Q. Waste Operator licensing* We agree that licensing is required to ensure that collectors and operators operate to basic standards that uphold public and environmental health and wellbeing. We agree that there is a lack of data and accountability in the absence of Council oversight over waste collectors and operators. We agree that licensing requirements are an appropriate means for the Council to achieve this oversight and overcome the recourse to commercial sensitivity. We support the two-year delay before provisions come into effect. We note that getting a good and consistent data reporting system is time consuming and resource intensive - ideally a reporting standard would be developed nationally and implemented regionally. Whatever approach Council adopts, it should align with the forthcoming Central Government regulations under s 86 of the WMA that will specify new data gathering requirements. We recommend careful consideration of the definition of "waste collector" and "waste operator". Would organisations that act as consolidation points for various waste streams (such as Sustainability Trust), fall under the licensing requirements if we were to take more than 20 tonnes a year? Some of the requirements, such as weighbridge receipts, could be unduly restrictive for these types of organisations. We note that there may be an impact on smaller providers if licensing fees are set too high. Also, it will be important to ensure timeframes between application for and granting of licenses is not unduly lengthy or smaller operators seeking to establish may be disadvantaged or delayed. We support the decision to choose 20 tonnes of waste a year as the cut off point for a waste collector or waste operator needing a license. We recommend that a 'light-touch' process still exist for waste collectors and operators handling fewer than 20 tonnes per year, such as an exemption process, to avoid

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:**Feedback**

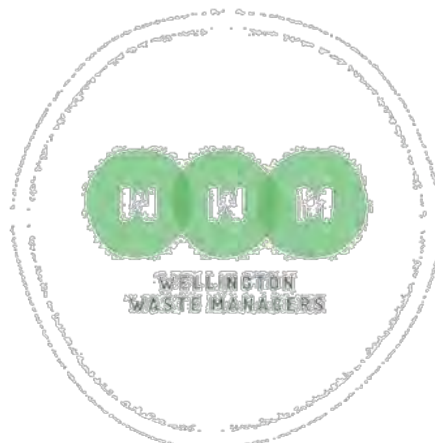
loopholes and the loss of important data. "Q. Proposed Bylaw controls" We support the proposal to implement Controls to accompany the bylaw. Controls provide for good flexibility to respond to changing circumstances; controls can be amended as appropriate rather than requiring a full review of the bylaw. We query the decision to limit future provision of Council-provided collection services for new multi-unit developments. We are unsure this will help Wellington achieve effective waste minimisation. We support standards requiring the mandatory diversion of recyclable material away from landfill when using the Southern Landfill. We recommend that the list include electronic waste and all metal (given that the Southern Landfill offers recycling/diversion services for these items), and all batteries (not just Lead Acid batteries) given that batteries with other chemistries, including lithium-ion, can cause catastrophic fires. We support the intention behind the rule to limit green waste placed in a Council waste receptacle for kerbside collection to 10 percent. However, we are disappointed that this rule is silent on food waste and we query why a limit on food waste in a waste receptacle has not also been set? If this is because there aren't currently enough options for food waste diversion, then more ambition is required from Council to set the direction of travel for householders and increase investment in localised composting solutions, as this is one of the largest opportunities to reduce waste from landfill (alongside unlocking many other co-benefits, such as enhanced food security and urban resilience). We support Controls to require the separation of waste types. However, we recommend that a rule is included to set a maximum limit on recyclable materials placed in a Council waste receptacle. This would require all managers/owners of premises, including commercial premises, to separate waste and recycle. At present, many businesses do not sort their waste for recycling, and we have heard directly from some businesses that their building owner refuses to provide recycling services. We support rules restricting the deposit of specific waste material, including prohibited waste. We recommend an express statement in either the rules or cl 6 (or both) that the scope of materials prohibited includes batteries and electronic waste containing batteries. Many people are unaware of the dangers these items present for waste collection, sorting, recycling and disposal systems, including catastrophic fires that can destroy entire Material Recovery Facilities. We do not support Control 2.1a and b, which set a blanket prohibition on all Waste Collection Services between the hours of 7:00am and 6:00pm in areas within the Central City, and between the hours of 7:00am–9:00am and 4:00pm–6:00pm on any Principle or Arterial road. We recommend this Control be amended to include exceptions to allow small operators (i.e. that don't use trucks, and instead use bikes/ebikes and trailers, electric cars/vans, or other light vehicles) to operate during these hours, as they do not cause congestion. An operational example is Kaicycle Composting, a non-profit composting service provider that currently collects organic waste from 59 businesses, households and apartment complexes in the CBD, during normal working hours, diverting 20–30 tonnes per year from landfill. Kaicycle is set to expand its capacity, including collections from the Central City and Principle/Arterial roads, but is only able to operate during daylight hours due to the nature of their low-carbon, rented ebike-based collection system. The currently proposed Bylaw Controls would severely limit Kaicycle Composting's ability to operate and divert organic waste from landfill, and would reduce composting options currently available in central locations where—and for small-scale organic waste producers for whom—composting options are fewest. Kaicycle has received several WCC funding grants since its establishment in 2015. We note that the currently proposed process for approving a variation to these collection times, given the permitted reasons (reasons of health, safety or congestion) and complicated decision-making process, will likely pose high and potentially insurmountable barriers to the operation of small, non-congestion-inducing operators, especially non-profits. We query Control 2.9a, which restricts the placement of any waste receptacle for collection between 7:00am and 6:00pm. We recommend this be amended to allow exceptions for waste collection services that are not provided by the Council, such as Kaicycle Composting, as appropriate.

Joint submission to the Wellington City Council on the

Proposed Solid Waste Management and Minimisation Bylaw 2020

Submitted 16 September 2020

This submission has been prepared jointly by Sustainability Trust, The Rubbish Trip, Kaicycle, and Wellington Waste Managers. Each organisation may also make their own separate, individual submissions.



General comments about the Proposed Bylaw and Controls

We welcome and support this review and update of the waste-related provisions of the bylaw. We recognise that bylaws are an important regulatory tool for WCC and that the current bylaw does not encourage waste minimisation and a decrease in waste disposal.

We strongly support the proposal to include Control-making powers in cl 7 of the bylaw as this will greatly increase Council's flexibility to respond to changes in the waste and recycling sector and the waste minimisation/zero waste landscape.

We welcome that this review of the bylaw is regionally coordinated and that the proposals, once approved, will be replicated across the regions, which will enhance consistency. **We urge** Council to keep in mind how the bylaw and controls could impact on small-scale waste operations (including community-led and non-profit operations), and ensure the bylaw and controls support these small-scale operations and their constant improvement of practices, instead of making it more difficult for them to function. Small-scale, community-based waste operations have a multitude of positive outcomes, including reduced transport emissions and more jobs created.

We are disappointed by the lack of ambition in this bylaw and the associated controls, as currently drafted, which fail to capture the growing global and local acceptance of zero waste and circular economy theory and practice. **We do not believe** that the nature of the proposals make the most of this once in a decade opportunity to review and update the bylaw, nor do they adequately respond to the urgent need to turn around Wellington's ever-increasing waste to landfill. **We note** that the Council has declared a climate emergency. Waste minimisation, including reducing and diverting food waste from landfill, is critical for responding to the climate emergency and achieving the Te Atakura blueprint to make Wellington City a zero carbon capital.

We recommend that Council clearly articulate a vision for a zero waste/waste-free Wellington (and work collaboratively for a zero waste/waste-free Greater Wellington region) and devise bylaws that help advance these goals. The current Waste Management and Minimisation Plan (from 2017) is inadequate and needs to be revisited and updated. Despite this, the proposed bylaw and controls don't get us much closer to achieving even some of the baseline goals of the current WMMP.

We recommend that the Council embrace the language of waste minimisation, zero waste and the circular economy in the proposed bylaw and controls. At present, the proposals focus excessively on "diversion", "collection" and "management" - all concepts and systems associated with the bottom of the waste hierarchy. The proposals miss the opportunity to encourage or require waste prevention, reduction, minimisation and reuse. We acknowledge that these topics feature in the proposed construction & demolition (C&D) provisions and we welcome these, but don't understand why they aren't raised throughout the bylaw and controls.

We recommend that the Council take advantage of the scope of the cl 7 Control-making powers and propose rules that cover a broader range of matters. For example:

- Propose rules pertaining to the size or type of receptacles. We believe Council should consider restricting the capacity of household waste receptacles (as per Taupō that restricts household waste receptacles to 120 litres) to reduce waste to landfill and increase waste separation and recycling. We also seek clarity on whether Council will be amending the rules in the Controls to reflect the recent recommendations of the report by WasteMINZ around standardising kerbside rubbish and recycling collections?

- Propose rules for waste collection services that could increase waste separation and recycling (at present the rules in this area are very focused on mitigating public nuisance and litter). For example, Council could require waste collectors and operators to shift to providing a weekly collection service but alternate waste and recycling each week so waste collections become fortnightly. Furthermore, we would like to see rules that require commercial waste collectors to provide a recycling collection service to householders as a criteria for licensing. This is needed to ensure that those householders who do not have access to a Council-provided waste and recycling collection still have access to recycling collection services.

We are disappointed that the bylaws do not mandate the separation and separate collection of recyclables for all premises. It's 2020 - we cannot wait another ten years to achieve 100% separation of recyclables in New Zealand's capital city.

We recommend adding clauses and rules that place a greater focus on services for organic waste. We acknowledge the proposals' attention to increasing waste separation and recycling collections. However, we don't understand the lack of attention to organic waste, which constitutes the single biggest proportion of the average Wellingtonian's household rubbish bin. Diverting food waste from landfill towards localised composting solutions is one of Wellington's biggest opportunities to address both waste and GHG emissions. We are blessed with leaders in this field in the form of Kaicycle and Capital Compost. Harnessing the potential of organic 'waste' in Wellington could set us apart as a visionary model for other urban areas to follow. We note that services for organic waste may not necessarily look like collections and could also include local drop-off points and professionally-run, community-scale composts.

We recommend that cl 8 more clearly distinguishes obligations for residential and commercial premises. We believe insufficient attention is given to commercial waste in the city. We note the sector-based clauses for events and C&D and **we recommend** that a new clause is inserted that focuses on the hospitality industry. Hospitality offers a key opportunity for waste reduction as well as introducing waste reducing behaviours to a wider audience. If done well, this could offer cost savings for the hospitality industry.

We recommend that the bylaw and controls set some rules and expectations around Council procurement practices to minimise waste at Council offices, council run events, and council building projects.

We recommend that the bylaw strengthens the provisions around enforcement and clarifies the criteria against which plans will be approved or evaluations of plans will be required.

We note that alongside a lack of clear rules and regulations, there is an ongoing need for investment in activities and infrastructure for resource processing and waste minimisation, including initiatives led by communities and small businesses. We see a clear opportunity for investment in systems geared around reuse, such as resource recovery centres, washing and sterilisation infrastructure and reverse logistics. These systems would reduce waste in daily city life generally, as well as at events, and would generate local, meaningful jobs.

We note that new rules and regulations must be accompanied by non-regulatory guidance, such as community education, guidelines and the provision of information about appropriate operational practices. There will also be the need for clear communications to all those impacted by the changes. The guidance and communications need to be developed alongside zero waste organisations and businesses already demonstrating best practice.

We query definitions given in Part A and would welcome further explanation:

- The definition of 'household waste' does not include: prohibited waste, hazardous waste, liquid waste, or construction and demolition waste. Does this limit what the Council can impose in terms of controls under the bylaw?
- Definitions are given for all waste streams. Why is the definition of 'organic waste' the only one that is defined in relation to Clause 7?

Questions from the submission form

Q. Multi-unit dwellings

The Council is proposing that all new large multi-unit developments (comprising of 10 or more dwellings), provide adequate space for the storage and collection of all waste generated within that development.

The Bylaw also requires a related waste management plan to be submitted to the Council prior to building construction. This plan will need to demonstrate, amongst other things, how waste material generated on site will be minimised.

To what extent do you agree or disagree with the proposed Bylaw requirements regulating waste management and minimisation planning for multi-unit dwellings?

SOMEWHAT AGREE

We support the requirement that managers/owners of multi-unit developments make adequate provision for waste and recycling facilities and collection services.

We strongly support the requirement that owners/managers of a planned multi-unit development submit a waste management plan before construction begins. If waste is considered before construction, there's far greater potential to ensure systems maximise waste minimisation (rather than trying to retrofit systems after the fact).

We recommend that the plans are called "waste minimisation and management plans" to capture Council's expectation that multi-unit developments will achieve waste minimisation outcomes. **We recommend** that plans be required to consider the waste hierarchy.

We note that the expectations for multi-unit developments are very focused on storage of waste and recycling for collection and removal, which limits the scope for waste minimising activity. One key area of opportunity for future multi-unit developments is organic waste. Given the growing concern to divert organic material from landfill towards beneficial use, and to increase food security, it would be good to see an expectation that future multi-unit developments set aside space (outside or in basement area) to compost/vermicompost organic material produced on site. This could link in with the goal of increasing community compost hubs around the city and be incorporated into pre-construction waste management plans.

We recommend that Council provide guidance, including best practice, so that managers and owners understand what "adequate provision" for management of waste, recycling and organic waste looks like. In this guidance, there could be potential to align with Homestar ratings. Furthermore, we note that managers may sometimes be volunteers with limited time, resources or expertise. If managers are not paid for their role, it may be more appropriate to place this responsibility with the owner(s) of the development.

We query why Council is proposing to withdraw the provision of waste and recycling collection services for new multi-unit developments?

Q. Event waste management

The Bylaw seeks to regulate waste management and minimisation when planning a large event of 1000+ people. An event is proposed to include any organised temporary activity of significant scale that is likely to create litter and includes (but is not limited to) an organised outdoor gathering, open-air market, parade, sporting event, protest, festival, concert or celebration.

While indoor private functions, indoor performances and regularly occurring recreational activities such as sports events are excluded from this standard, other event organisers will be required to submit an event management plan to the Council for approval prior to the event.

The plan would need to demonstrate: (1) how waste generated by the event is to be minimised; (2) the steps that will be taken to maximise the use of reusable systems, recycling and composting; and (3) the proposed method for minimising and capturing litter associated with the event.

To what extent do you agree or disagree?

SOMEWHAT AGREE

We agree that, as a controlled environment, events are a good opportunity to maximise waste segregation and diversion, while offering an opportunity to introduce a wide audience to waste reducing behaviours.

We support the requirement that event managers produce waste management plans (or, better yet, 'zero waste plans') before an event, for Council approval, and that event managers be required to follow these plans during the event. We also support events being encouraged to undertake a post-event waste analysis report.

We agree with the proposed one year delay before the provisions' commencement to allow for regional collaboration to establish guidance and resourcing to support event managers to deliver zero waste events, and support the collection and analysis of the waste data provided. The Council must ensure organisations such as Wellington Waste Managers, Para Kore, and Organic Wealth are included in this process.

We recommend amending the definition of "Event" in cl 6 of the Bylaw to be focused on defining an event, rather than defining the types of events that are or are not regulated by the bylaw. For example, an event should not be defined by its size or by exclusions such as whether it is indoors or outdoors. Rather than shifting these elements to cl 13 of the bylaw, we recommend shifting them into the Controls. This will allow flexibility to expand the scope of events in the future through a Council resolution rather than having to amend the bylaw.

We recommend that smaller events (between 100-1000 attendees) be required to submit a zero waste plan, even if this plan won't require Council approval. This will ensure all event organisers receive the same message that waste planning and minimisation is important, and give the Council the opportunity to share and communicate the resources available in Wellington to help event organisers minimise waste.

We do not support the blanket exclusion of indoor events from regulation. Council should be pushing indoor events to be more ambitious in their waste minimisation. Many of these indoor

venues receive Council funding or are Council operated and have greater access than outdoor venues to the kinds of facilities that support waste minimisation. They should be demonstrating best practice.

We recommend that event managers be required to submit waste management plans 90 days out for events of 10,000+ attendees, and 60 days out for events of 1000+ people. Thirty working days does not allow sufficient time to ensure that appropriate planning has taken place ahead of the event.

We recommend that plans be required to consider the waste hierarchy, so that waste prevention and reduction, and reuse of resources is prioritised over recycling. **We also recommend** renaming the plans. An "event waste management plan" sends a non-aspirational message from the Council to event managers that systems geared towards the bottom of the waste hierarchy (recycling and reducing litter) are sufficient. More exciting names that would better communicate what the Council is trying to achieve would be "Zero Waste Event Plan" or "event waste minimisation plan".

We recommend cl 13(d) be amended to include reference to the equipment needed to operate effective waste prevention and reduction systems at events, such as reuse systems that require sterilising/washing facilities. This is important, particularly given the focus on outdoor events. Serious consideration should be given to whether outdoor events should be permitted without a plan in place to ensure washing facilities are available that enable food vendors to offer reusables (given many of those vendors at a busy, outdoor event won't have those facilities themselves, especially if they are operating from trucks and stalls).

We recommend WCC work with those experienced in delivering reuse systems to create best practice guidance on implementing reusables at events in order to support event managers to consider these systems when creating their event waste management plan. **We note** that Council has a vital role in supporting and investing in the infrastructure necessary for scalable reuse systems, including washing and sterilisation equipment and reverse logistics.

We recommend amending cl 13.4 to automatically require all event managers who submit a waste management plan to also submit a post-event waste analysis report. Clause 14 should also be amended to specify that waste analysis reports include an evaluative breakdown of what worked well, what didn't, and notes on what improvements will be implemented the next time the event occurs.

We note that the use of the phrase "diverted" in cl 13.4 is outdated and restrictive in light of the rapid growth of event-based waste prevention and reduction systems (such as reuse systems). Diversion is useful for assessing waste separated and sorted for recycling and composting, but doesn't capture waste streams that were avoided entirely. **We recommend** that alongside accounting for waste diverted, event managers be required to account for any practices adopted that prevented or reduced waste. For example, number of serves in reusable serviceware or other measures deemed appropriate. For events that reoccur (e.g. annually), a requirement to conduct post-event waste analysis reports and waste audits will enable event managers to track progress in waste reduction each time the event reoccurs.

We note that enforcement will be critical to success. Who will receive and check plans at Council and what will the criteria be for approval? Who will monitor that the plans are being delivered? Under what circumstances will the Council require an event manager to provide a waste analysis report?

Q. Construction and demolition waste management

The proposed Bylaw and associated Bylaw controls requires all large construction projects (valued at \$2 million+) to consider waste management and minimisation

planning as part of their project planning and submit an associated construction site and demolition waste management plan to the Council for approval.

Amongst other things, this plan will need to set out: (1) the proposed method of waste management for each type of waste (e.g. reuse, recovery, recycling, disposal); and (2) the proposed method for minimising and capturing litter associated with the project and the building work.

To what extent do you agree or disagree?

SOMEWHAT AGREE

We agree that a massive opportunity exists to divert construction and demolition (C&D) waste from landfill and that regulation is needed to achieve this.

We agree that the proposed changes to the bylaw and the proposed Controls will complement Central Government's decision to increase and expand the landfill levy, which will make landfilling C&D waste more expensive.

We support requiring any person applying for building work consent to submit a construction site and demolition waste management plan for approval by Council before the building work can start.

We recommend that the plans should be called "waste minimisation and management plans" to better capture the Council's goal of minimising C&D waste to landfill, not simply managing it differently. **We recommend** that plans be required to consider the waste hierarchy, so that waste prevention and reduction and reuse of resources is prioritised over recycling. With recycling opportunities in the city currently limited, reuse is a real opportunity in relation to refurbishment projects.

We recommend that cl 14 be amended to make clear that "building work" includes refurbishment projects.

We query the decision to require waste management plans be submitted only for building work valued at \$2m or more - how was this figure decided? **We recommend** that smaller projects be required to submit a plan, even if this plan doesn't require Council approval. This will ensure all contractors are receiving the same message from Council that waste planning and minimisation is important.

We support the goals of clauses 14.4 and 14.5 to gather data on waste generation and minimisation and resource recovery during C&D projects, and encourage a post-build evaluation of the success in implementing the waste management plan and any cost savings. **We note** that as drafted it is unclear under what circumstances Council might require principal contractors to undertake these activities. **We recommend** that these activities are compulsory for all building work that required a waste management plan to be submitted for Council approval.

We note that enforcement will be critical to success. Who will receive and check plans at Council and what will the criteria be for approval? Who will monitor that the plans are being delivered?

We note that Council must make plans to divert funding from its allocation of the waste disposal levy revenue towards infrastructure to support resource recovery and waste minimisation in the C&D sector.

Q. Restricting unaddressed and advertising mail

The Bylaw proposes to formally restrict the deposit of unaddressed mail or advertising mail in letter boxes that are clearly marked with the words “no circulars”, “no junk mail” or “addressed mail only”.

There are exceptions for public notices from the government, as well as for different types of information from community organisations and charities.

To what extent do you agree or disagree?

DEFINITELY AGREE

Q. Waste Operator licensing

The Council has proposed to establish Waste Operator licensing. This would involve mandatory licensing for any person or entity that collects or transports more than 20 tonnes of waste per year within the Wellington City District. Licensing would not apply to individuals who collect or transport waste for personal reasons.

The primary purpose of this proposed licensing system is for the Council to collect relevant waste-related data from the private sector and to ensure private waste operators are operating in a manner that is consistent with the Council’s waste-related objectives.

To what extent do you agree or disagree?

SOMEWHAT AGREE

We agree that licensing is required to ensure that collectors and operators operate to basic standards that uphold public and environmental health and wellbeing.

We agree that there is a lack of data and accountability in the absence of Council oversight over waste collectors and operators.

We agree that licensing requirements are an appropriate means for the Council to achieve this oversight and overcome the recourse to commercial sensitivity.

We support the two-year delay before provisions come into effect.

We note that getting a good and consistent data reporting system is time consuming and resource intensive - ideally a reporting standard would be developed nationally and implemented regionally. Whatever approach Council adopts, it should align with the forthcoming Central Government regulations under s 86 of the WMA that will specify new data gathering requirements.

We recommend careful consideration of the definition of “waste collector” and “waste operator”. Would organisations that act as consolidation points for various waste streams (such as Sustainability Trust), fall under the licensing requirements if we were to take more than 20 tonnes a year? Some of the requirements, such as weighbridge receipts, could be unduly restrictive for these types of organisations.

We note that there may be an impact on smaller providers if licensing fees are set too high. Also, it will be important to ensure timeframes between application for and granting of licenses is not unduly lengthy or smaller operators seeking to establish may be disadvantaged or delayed.

We support the decision to choose 20 tonnes of waste a year as the cut off point for a waste collector or waste operator needing a license. **We recommend** that a 'light-touch' process still exist for waste collectors and operators handling fewer than 20 tonnes per year, such as an exemption process, to avoid loopholes and the loss of important data.

Q. Proposed Bylaw controls

A new set of bylaw controls is also proposed that may affect how you dispose of your waste and recycling.

Amongst other things, these controls regulate waste and recycling servicing and collection times, restrict servicing access for new multi-unit developments (of 10 or more dwellings), restrict servicing access on private roads and on roads where there are operational limitations, restrict the amount of green waste permitted within Council waste receptacles, and prohibit a range of dangerous or potentially hazardous material from being deposited into kerbside waste bags or containers.

The controls also introduce a new set of waste separation standards for users of the Southern Landfill.

To what extent do you agree or disagree?

SOMEWHAT AGREE

We support the proposal to implement Controls to accompany the bylaw. Controls provide for good flexibility to respond to changing circumstances; controls can be amended as appropriate rather than requiring a full review of the bylaw.

We query the decision to limit future provision of Council-provided collection services for new multi-unit developments. We are unsure this will help Wellington achieve effective waste minimisation.

We support standards requiring the mandatory diversion of recyclable material away from landfill when using the Southern Landfill. **We recommend** that the list include electronic waste and all metal (given that the Southern Landfill offers recycling/diversion services for these items), and all batteries (not just Lead Acid batteries) given that batteries with other chemistries, including lithium-ion, can cause catastrophic fires.

We support the intention behind the rule to limit green waste placed in a Council waste receptacle for kerbside collection to 10 percent. However, **we are disappointed** that this rule is silent on food waste and **we query** why a limit on food waste in a waste receptacle has not also been set? If this is because there aren't currently enough options for food waste diversion, then more ambition is required from Council to set the direction of travel for householders and increase investment in localised composting solutions, as this is one of the largest opportunities to reduce waste from landfill (alongside unlocking many other co-benefits, such as enhanced food security and urban resilience).

We support Controls to require the separation of waste types. However, **we recommend** that a rule is included to set a maximum limit on recyclable materials placed in a Council waste receptacle. This would require all managers/owners of premises, including commercial premises, to separate waste and recycle. At present, many businesses do not sort their waste for recycling, and we have heard directly from some businesses that their building owner refuses to provide recycling services.

We support rules restricting the deposit of specific waste material, including prohibited waste. **We recommend** an express statement in either the rules or cl 6 (or both) that the scope of

materials prohibited includes batteries and electronic waste containing batteries. Many people are unaware of the dangers these items present for waste collection, sorting, recycling and disposal systems, including catastrophic fires that can destroy entire Material Recovery Facilities.

We do not support Control 2.1 a and b, which set a blanket prohibition on all Waste Collection Services between the hours of 7:00am and 6:00pm in areas within the Central City, and between the hours of 7:00am–9:00am and 4:00pm–6:00pm on any Principle or Arterial road.

We recommend this Control be amended to include exceptions to allow small operators (i.e. that don't use trucks, and instead use bikes/ebikes and trailers, electric cars/vans, or other light vehicles) to operate during these hours, as they do not cause congestion. An operational example is Kaicycle Composting, a non-profit composting service provider that currently collects organic waste from 59 businesses, households and apartment complexes in the CBD, during normal working hours, diverting 20–30 tonnes per year from landfill. Kaicycle is set to expand its capacity, including collections from the Central City and Principle/Arterial roads, but is only able to operate during daylight hours due to the nature of their low-carbon, rented ebike-based collection system. The currently proposed Bylaw Controls would severely limit Kaicycle Composting's ability to operate and divert organic waste from landfill, and would reduce composting options currently available in central locations where—and for small-scale organic waste producers for whom—composting options are fewest. Kaicycle has received several WCC funding grants since its establishment in 2015.

We note that the currently proposed process for approving a variation to these collection times, given the permitted reasons (reasons of health, safety or congestion) and complicated decision-making process, will likely pose high and potentially insurmountable barriers to the operation of small, non-congestion-inducing operators, especially non-profits.

We query Control 2.9a, which restricts the placement of any waste receptacle for collection between 7:00am and 5:00pm. We recommend this be amended to allow exceptions for waste collection services that are not provided by the Council, such as Kaicycle Composting, as appropriate.

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
Feedback

Submitter: Ellen Blake

Suburb: N/A

On behalf of: Living Streets Aotearoa

134

Q1. You are making this submission as: Individual

Q2. Would you like to make an oral submission to the Councillors on Thursday, 22 October 2020? Yes

Q3. Multi-unit dwellingsThe Council is proposing that all new large multi-unit developments (comprising of 10 or more dwellings), provide adequate space for the storage and collection of all waste generated within that development.The Bylaw also requires a related waste management plan to be submitted to the Council prior to building construction. This plan will need to demonstrate, amongst other things, how waste material generated on site will be minimised.

To what extent do you agree or disagree with the proposed Bylaw requirements regulating waste management and minimisation planning for multi-unit dwellings? Somewhat agree

Q4. Event waste managementThe Bylaw seeks to regulate waste management and minimisation when planning a large event of 1000+ people. An event is proposed to include any organised temporary activity of significant scale that is likely to create litter and includes (but is not limited to) an organised outdoor gathering, open-air market, parade, sporting event, protest, festival, concert or celebration.While indoor private functions, indoor performances and regularly occurring recreational activities such as sports events are excluded from this standard, other event organisers will be required to submit an event management plan to the Council for approval prior to the event.The plan would need to demonstrate: (1) how waste generated by the event is to be minimised; (2) the steps that will be taken to maximise the use of reusable systems, recycling and composting; and (3) the proposed method for minimising and capturing litter associated with the event.

To what extent do you agree or disagree with the proposed event waste management and minimisation standards for Definitely agree

Q5. Construction and demolition waste managementThe proposed Bylaw and associated Bylaw controls requires all large construction projects (valued at \$2 million+) to consider waste management and minimisation planning as part of their project planning and submit an associated construction site and demolition waste management plan to the Council for approval.Amongst other things, this plan will need to set out: (1) the proposed method of waste management for each type of waste (e.g. reuse, recovery, recycling, disposal); and (2) the proposed method for minimising and capturing litter associated with the project and the building work.

To what extent do you agree or disagree with the proposed requirement to consider waste management and minimisation planning for high value building projects? Definitely agree

**Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
 Feedback**

- Q6. Restricting unaddressed and advertising mail**The Bylaw proposes to formally restrict the deposit of unaddressed mail or advertising mail in letter boxes that are clearly marked with the words "no circulars", "no junk mail" or "addressed mail only". There are exceptions for public notices from the government, as well as for different types of information from community organisations and charities.

To what extent do you agree or disagree with this new restriction? Somewhat agree

- Q7. Waste Operator licensing**The Council has proposed to establish Waste Operator licensing. This would involve mandatory licensing for any person or entity that collects or transports more than 20 tonnes of waste per year within the Wellington City District. Licensing would not apply to individuals who collect or transport waste for personal reasons. The primary purpose of this proposed licensing system is for the Council to collect relevant waste-related data from the private sector and to ensure private waste operators are operating in a manner that is consistent with the Council's waste-related objectives.

To what extent do you agree or disagree with the establishment of waste operator and facility licensing? Somewhat agree

- Q8. Proposed Bylaw controls**A new set of bylaw controls is also proposed that may affect how you dispose of your waste and recycling. Amongst other things, these controls regulate waste and recycling servicing and collection times, restrict servicing access for new multi-unit developments (of 10 or more dwellings), restrict servicing access on private roads and on roads where there are operational limitations, restrict the amount of green waste permitted within Council waste receptacles, and prohibit a range of dangerous or potentially hazardous material from being deposited into kerbside waste bags or containers. The controls also introduce a new set of waste separation standards for users of the Southern Landfill.

To what extent do you agree or disagree with the proposed bylaw controls? Somewhat agree

- Q9. Are there any other comments you would like to make about the proposed Bylaw and/or the proposed Bylaw controls?**

Please require households to place rubbish and recycling for collection on the roadside kerb - so that our narrow footpaths remain clear for pedestrians. This is a significant issue on rubbish collection day. Similarly there should only be one day per week per suburb for rubbish collection so that bins are not constantly present on the footpath. Central area rubbish collection needs more control in placement and management of rubbish - off the footpaths please and tied up so it does not blow everywhere.

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
Feedback

Submitter: Steve Almond

Suburb: N/A

On behalf of: Wellington City Environmental
Reference Group

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Q1. You are making this submission as: Wellington City Council Environmental Reference Group (ERG)

Q2. Would you like to make an oral submission to the Councillors on Thursday, 22 October 2020? Yes

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**Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
 Feedback**

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Q9. Are there any other comments you would like to make about the proposed Bylaw and/or the proposed Bylaw controls?

Proposed Solid Waste Management and Minimisation Bylaw 2020 Submission from: Wellington City Council Environmental Reference Group (ERG) Contact name: Steven Almond, Waste Portfolio Leader for ERG steven.almond@hotmail.com ERG Email address: c/- Hedi Mueller, Democracy Advisor and contact for WCC ERG hedi.mueller@wcc.govt.nz Postal address: WCC PO Box 2199 WELLINGTON 6140 Attn: Hedi Mueller In addition to this submission, we would like to make an oral submission to councillors on Thursday 22nd October. Purpose of the Environmental Reference Group (ERG): ● Advise Council on the best ways to improve Wellingtonian's quality of life environmentally, socially, culturally and economically by protecting and enhancing the local environment. ● Bring knowledge and insight into Council around the environment, including water, energy, climate change, resilience, waste, biodiversity, urban design and transport management, in the context of Council's roles and priorities. ERG Principles guiding advocacy on waste policy proposals: ● Incorporate waste reduction as a vital part of Wellington's climate change mitigation plan. ● Prioritise a Circular Economy approach to waste for both industry and residents: o Design out waste o Keep materials in use o Regenerate natural systems ● Wellington to play a key role in transitioning to a circular model, regionally and nationally ● Transparency. Wellingtonians need to understand where their waste and recycling goes and what effects it has. ● Landfill should be used as a transitional solution, and designed to be safe and resilient for future residents and biodiversity. Summary of the Proposed Bylaw The proposed Bylaw has updated the Council's existing Waste Management Bylaw provisions in a number of ways to ensure the requirements are clear, relevant and consistent with current legislation, national practices, and with Council's Waste Management and Minimisation Plan (hereafter WMMP) and broader goals. A number of the provisions in the proposed Bylaw are new to Wellington City. They will enable the Council to take action on particular issues where this has not previously been possible. The purpose of the Bylaw is to: • promote and deliver effective and efficient waste management and minimisation; • implement the Wellington Region WMMP; • encourage waste minimisation and a decrease in waste disposal in order to protect the environment from harm; and provide environmental, social, economic, and cultural benefits; • regulate waste collection, transport and disposal, including recycling, waste storage and management; • set controls regarding the responsibilities of customers who use approved solid waste services, and the licensing of waste collectors and waste operators; • protect the health and safety of waste collectors, waste operators and the public; and • manage litter and nuisance relating to waste in public places. The Bylaw must be consistent with the Wellington Region WMMP. The proposed Bylaw supports the key goals of the WMMP which include maximising opportunities to reduce the amount of waste sent to landfill, reduce the harmful and costly effects of waste, and improve efficiency of resource use. General feedback: ● The WMMP project started in 2017, with the target to reduce waste across the region by a third by 2026. Currently the region is not on track to achieve the WMMP goals. Therefore, the actions from this bylaw should be implemented across the region within 12 months to give the best chance of achieving the WMMP targets by 2026. ● We urge WCC along with other councils to resolve all region-wide regulations for licensing,

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:

Feedback

waste plan requirements, and resourcing requirements to launch the new WMMP package as a whole within 12 months. ● Be bolder - Public attitudes to waste have changed significantly since 2017, there is now significantly greater demand for serious waste reduction. Furthermore, methane emissions from organic matter in landfill are directly impacting Wellington's efforts to reduce greenhouse gas (GHG) emissions under Te Atakura, and must be addressed within these bylaws. ● We urge the council, as part of this work, to actively review all other areas of WCC regulations that can impact and will be impacted by these bylaws, in order to take a more holistic approach to waste management and GHG emissions. For example; three waters, and building consents. ● The management of organic matter is a major omission in the proposed bylaws. San Francisco has had programmes in place since 2006 that diverts organic and green waste into composting. Increasing ETS costs for methane emissions from landfills make landfilling organic waste financially, as well as environmentally, unviable as a long-term solution. ● Additional clarity is needed regarding use of data obtained from operators. How will this inform changes in regional infrastructure, future legislation, etc...? ● Positive incentives for collectors to work towards the WMMP targets are lacking and need consideration. ● Positive incentives for residents to reduce, divert, and reuse 'waste' should be incorporated. For example; incentives were implemented by Cardinia Shire Council, Victoria. ● A circular economy model only works when material is "pulled out" as well as fed into the system. WCC should champion this by stipulating reuse of materials and products, refurbishment of existing products, and application of materials with high recycled content, in their own projects. For example; the Central Library Development. ● Waste infrastructure developments should be incorporated into the spatial plan. Summary of key changes proposed

Waste management responsibilities Current bylaw: Outlines some responsibilities but not in a comprehensive manner. Proposed Bylaw: Provides greater clarity and detail in terms of the general and specific responsibilities of owners, managers and occupiers of premises, and of waste collectors and waste operators. Feedback: ● The ERG fully supports greater clarity for stakeholders throughout the waste generation and collection cycle. Achieving region wide waste reduction goals requires all stakeholders to play their part, and this needs to be clarified and supported by regional councils as a whole. ● In providing that information to stakeholders, ERG recommends that they are simultaneously informed about the status of Wellington's current waste behaviours, both nationally and globally, as context. NZ is the worst in the OECD for Municipal Waste. Licensing of waste collectors and operators Current bylaw: There are no requirements for licensing of service providers/operators. Proposed Bylaw: Introduces a mandatory registration (licensing) system for waste collectors and waste operators to enable Council to: • effectively regulate private collection services to ensure they are aligned with the WMMP and Council's waste management objectives; • collect better data on waste streams, waste management and service operations; and • fulfil its responsibilities to promote effective and efficient waste management and minimisation. A two-year delay is proposed before the provisions come into effect to allow the Council, along with other Councils in the Wellington region, to establish an appropriate regional system (and resourcing) to manage the applications and data collected. Feedback: ● The region is currently not on track to achieve the goals of the WMMP. The ERG urges councils to establish and resource this new system within 12 months rather than two years. This still only leaves four years to achieve the WMMP regional waste reduction targets by 2026. ● Collection of objective data is critical, and should not only rely on waste collectors and operators to do the reporting. The reporting system should ensure consistency across all waste streams for a range of indicators, including methane, and carbon emissions. ● Annual reporting should require a minimisation plan in line with regional targets. ● Early stakeholder engagement and collaboration with operators in designing the reporting system is critical. ● Consideration of incentivisation is needed. It's important that collectors are incentivised to achieve goals in reduction, diversion and reuse. ● How can collectors be positively incentivised to achieve the WMMP goals?

Waste management for multi-unit developments Current bylaw: There are no requirements for dealing with waste generated by multi-unit developments. Proposed Bylaw: Multi-unit developments (defined under the proposed Bylaw as 10 or more residential units) such as apartments, townhouses, retirement villages and gated communities can be problematic in terms of waste management and minimisation, particularly if inadequate provision is made for waste storage and servicing within the development. The proposed provisions are intended to encourage appropriate planning and provision for waste management in all multi-unit developments, and ensure adequate provision is made for waste management facilities and servicing in new multi-unit developments. In addition, a supporting control is being proposed that will limit the future provision of Council-provided collection services for new multi-unit developments of 10 or more. Feedback: ● ERG fully supports the requirement to plan for adequate waste management at the building design stage as a requirement of consent. ● We are not convinced that the limit of 10+ units requiring adequate waste facilities is sufficient. The very successful waste management programme in San Francisco City uses 6 units as the minimum measure, for example. ● The ERG does not support council no longer providing waste collection services to new

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:**Feedback**

multi-unit dwellings of 10+ units. Commercial waste providers have no more power than the council to enforce proper sorting, placement, provision of waste facilities in these developments. There is a high risk of a commercial contractor withdrawing services due to hygiene and safety concerns, resulting in the council having to step in regardless. ● Instead, it's suggested WCC provides innovative methods for waste collection at these developments to solve this issue. For example; this card-operated domestic collection system in Ljubljana provides separation facilities to residents, and is more efficient for waste operators. Ljubljana has reduced waste to landfill by 80% since 2008, sending 115kg per resident to landfill per year. For comparison, 608kg are sent to landfill per person in the Wellington region. Not only do these systems improve waste separation, but reduce collection frequency, therefore reducing carbon emissions, reduce traffic congestion, and in the long-term are more economical to operate. ● It's recommended that WCC maintains servicing at these existing and problematic sites in order to retain the greatest control ability to achieve waste minimisation. Waste management for events

Current bylaw: There are no regulatory requirements for dealing with waste generated by events. **Proposed Bylaw:** The provisions provide the ability to manage waste at events and ensure adequate provision is made for waste management. Requires the preparation of a waste management plan (for approval by Council) for public events of a significant scale (an expected attendance of 1,000 or more people over its duration) that will generate waste (exceptions apply). The intent is to encourage better planning and management of waste and to ensure adequate provision is made for waste management facilities and services for events. The proposed one year delay in the commencement of these provisions allows Council to work in partnership with the other Wellington councils to establish appropriate guidance and resourcing to support event managers, and the collection and analysis of the waste data provided. **Feedback:** ● This measure is fully supported for the following reasons: ○ Waste infrastructure is readily available to divert various event waste stream from landfill ○ This fits in with current requirements for a health and safety risk assessment so is 'best practice' ● It's recommended to provide typical event waste volumes per person, and encourage targets for waste reduction for the applied event and future events in line with regional minimisation targets. ● Supporting material should be consistent across the Wellington region (e.g. signage colours and collection separation types, in order to simplify messaging and waste diversion). ● It is essential WCC champions these rules for its own events. ● Rather than delay for 12 months, WCC could immediately alert all event organisers that any forthcoming events are expected to include high-quality waste management systems, together with some interim guidelines that could be trialled. **Management of construction and demolition (C&D) waste**

Current bylaw: There are no requirements for dealing with waste generated by C&D activities. **Proposed Bylaw:** Waste generated from construction and demolition activities can be a significant issue. The provisions provide the ability for Council to make a control to require the preparation of a waste management plan (for approval by Council) for building work over a certain specified dollar value (as set by Council). The focus is on high value builds that generate a lot of waste. Providing the ability for Council to set a control to require the preparation of a waste management plan for high value builds aims to reduce waste by encouraging the consideration of waste issues early in the building/ construction process. It also supports the WMMP objectives for construction and demolition waste. It will help improve local and regional data on the management of construction and demolition waste, encourage reuse and recycling, and help ensure residual materials are taken to an appropriate disposal or recovery facility. Better data will also support increased understanding of construction and demolition waste issues and will inform and support the development of appropriate tools to help manage the issues. A supporting control is being proposed that will require a C&D waste management plan for projects with an estimated value of \$2 million or greater. **Feedback:** ● The average cost to build a dwelling in the Wellington region is \$435k, meaning most current house builds sit outside of this regulation. ● The \$2 million threshold for C&D projects to require waste plans is too high. The ERG would like to see the bylaw covering all building work requiring a consent. This is because Wellington is growing rapidly, and set to continue growing for several decades, so it's important to capture all building work now, within this bylaw. ● While setting a clear goal for all works needing consent to require a waste management plan by 2026, a phased or graduated approach that allows less impactful builds to make these changes over time might be feasible. For example, a simpler plan could be required for work under \$250k, and a more detailed plan required for works above this level. ● A measure should be included to link construction management plans with improvements in availability of C&D material recovery. ● We encourage regional councils and industry leaders to investigate opportunities for collaboration on reduction, diversion, and reuse of C&D waste streams. For example; a Wellington region C&D industry + council waste forum. ● Requiring a waste management plan is only part of the solution; reduction and reuse targets should also be included. ● To achieve the WMMP waste reduction goals, industry and councils should increase availability and access to material recovery infrastructure. For example: ○ Gypsum recovery

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:

Feedback

for waste gib board ○ Asphalt recovery ○ Concrete to aggregate recovery ○ Treated and non-treated timber processing
○ Usable construction material recovery, e.g. Reusable fixtures, fittings, and components ● To enable greater reuse of materials, WCC should request that MBIE adjust consenting rules to enable easier incorporation of reused materials. Currently these must be stockpiled in advance so that projects can specify exactly what they will be using. This prohibits growth in this market. ● Incentives for construction companies to 'do the right thing' is lacking. This is necessary to achieve buy-in from construction companies. ● WCC should require their own projects, (for example the Central Library Development) to achieve best-practice levels of waste minimisation and reuse. ● We encourage WCC to request necessary changes to building rules in order to achieve WMMP targets. For example; regulation of Insinkerator. Management of unaddressed mail and advertising material Current bylaw: There are no requirements for dealing with waste, litter and nuisance issues generated by unaddressed mail and advertising material. Proposed Bylaw: Unaddressed mail and advertising material can generate significant amounts of waste and can create litter issues. The proposed provisions support and enable the Council to regulate and take action on waste and litter issues that are caused by unaddressed mail and advertising material. Feedback: ● This bylaw is fully supported by the ERG. ● Guidance should be readily available on the WCC website for advertisers to choose materials fit for recycling infrastructure across the Wellington region. References C&D waste and recycling systems for small to medium construction sites: <https://www.envirowaste.co.nz/news/separation-at-source-key-to-construction-waste-minimisation/> San Francisco's Mandatory Recycling and Composting Ordinance: <https://sfenvironment.org/recycling-composting-faqs> Cost to build a home in Wellington: <https://www.canstar.co.nz/home-loans/otago-expensive-region-build-new-nz-home/> Cardinia Shire Council - Waste rebates and discounts https://www.cardinia.vic.gov.au/info/20002/rubbish_and_recycling/147/waste_rebates_and_discounts?fbclid=IwAR2BeiTS-SjcSj2dm2noF4Uc3uFV41Ne42sneeTQCEEvLvNmkkmDOAJEbY#section-4-apply-for-a-waste-rebate Reuse of building materials: <http://www.level.org.nz/material-use/minimising-waste/reuse-and-recycling/> Recycling and Composting in San Francisco: <https://sfenvironment.org/recycling-composting-faqs> Alternative waste and recycling collection systems for inner city residents in Ljubljana, Slovenia: <https://www.theguardian.com/cities/2019/may/23/zero-recycling-to-zero-waste-how-ljubljana-rethought-its-rubbish> Underground waste and recycling collection systems in Cambridge, UK: <https://resource.co/article/no-wheeler-bins-be-seen-uk-s-largest-underground-bin-system-takes-first-load-12143>

Proposed Solid Waste Management and Minimisation Bylaw 2020

Submission from: Wellington City Council Environmental Reference Group (ERG)

Contact name: Steven Almond, Waste Portfolio Leader for ERG

ERG Email address: c/- Hedi Mueller, Democracy Advisor and contact for WCC ERG
hedi.mueller@wcc.govt.nz

Postal address: WCC PO Box 2199 WELLINGTON 6140 Attn: Hedi Mueller

In addition to this submission, we would like to make an oral submission to councillors on Thursday 22nd October.

Purpose of the Environmental Reference Group (ERG):

- Advise Council on the best ways to improve Wellingtonian's quality of life environmentally, socially, culturally and economically by protecting and enhancing the local environment.
- Bring knowledge and insight into Council around the environment, including water, energy, climate change, resilience, waste, biodiversity, urban design and transport management, in the context of Council's roles and priorities.

ERG Principles guiding advocacy on waste policy proposals:

- Incorporate waste reduction as a vital part of Wellington's climate change mitigation plan.
- Prioritise a Circular Economy approach to waste for both industry and residents:
 - Design out waste
 - Keep materials in use
 - Regenerate natural systems
- Wellington to play a key role in transitioning to a circular model, regionally and nationally
- Transparency. Wellingtonians need to understand where their waste and recycling goes and what effects it has.
- Landfill should be used as a transitional solution, and designed to be safe and resilient for future residents and biodiversity.

Summary of the Proposed Bylaw

The proposed Bylaw has updated the Council's existing Waste Management Bylaw provisions in a number of ways to ensure the requirements are clear, relevant and consistent with current legislation, national practices, and with Council's Waste Management and Minimisation Plan (hereafter WMMP) and broader goals. A number of the provisions in the proposed Bylaw are new to Wellington City. They will enable the Council to take action on particular issues where this has not previously been possible.

The purpose of the Bylaw is to:

- promote and deliver effective and efficient waste management and minimisation;
- implement the Wellington Region WMMP;
- encourage waste minimisation and a decrease in waste disposal in order to protect the environment from harm; and provide environmental, social, economic, and cultural benefits;
- regulate waste collection, transport and disposal, including recycling, waste storage and management;
- set controls regarding the responsibilities of customers who use approved solid waste services, and the licensing of waste collectors and waste operators;
- protect the health and safety of waste collectors, waste operators and the public; and
- manage litter and nuisance relating to waste in public places.

The Bylaw must be consistent with the Wellington Region [WMMP](#). The proposed Bylaw supports the key goals of the WMMP which include maximising opportunities to reduce the amount of waste sent to landfill, reduce the harmful and costly effects of waste, and improve efficiency of resource use.

General feedback:

- The WMMP project started in 2017, with the target to reduce waste across the region by a third by 2026. **Currently the region is not on track to achieve the WMMP goals.** Therefore, the actions from this bylaw should be implemented across the region within 12 months to give the best chance of achieving the WMMP targets by 2026.
- We urge WCC along with other councils to resolve all region-wide regulations for licensing, waste plan requirements, and resourcing requirements to launch the new WMMP package as a whole within 12 months.
- **Be bolder** - Public attitudes to waste have changed significantly since 2017, there is now significantly greater demand for serious waste reduction. Furthermore, methane emissions from organic matter in landfill are directly impacting Wellington's efforts to reduce greenhouse gas (GHG) emissions under Te Atakura, and must be addressed within these bylaws.
- We urge the council, as part of this work, to actively review all other areas of WCC regulations that can impact and will be impacted by these bylaws, in order to take a more holistic approach to waste management and GHG emissions. For example; three waters, and building consents.
- The management of organic matter is a major omission in the proposed bylaws. San Francisco ¹ has had programmes in place since 2006 that diverts organic and green waste into composting. Increasing ETS costs for methane emissions from landfills make landfilling organic waste financially, as well as environmentally, unviable as a long-term solution.
- Additional clarity is needed regarding use of data obtained from operators. How will this inform changes in regional infrastructure, future legislation, etc...?
- Positive incentives for collectors to work towards the WMMP targets are lacking and need consideration.
- Positive incentives for residents to reduce, divert, and reuse 'waste' should be incorporated. For example; incentives were implemented by Cardinia Shire Council, Victoria.²
- A circular economy model only works when material is "pulled out" as well as fed into the system. WCC should champion this by stipulating reuse of materials and products,

¹[Recycling & Composting in San Francisco - FAQs](#)

²[Cardinia Shire Council - Waste rebates and discounts](#)

refurbishment of existing products, and application of materials with high recycled content, in their own projects. For example; the Central Library Development.

- Waste infrastructure developments should be incorporated into the spatial plan.

Summary of key changes proposed

Waste management responsibilities

Current bylaw:

Outlines some responsibilities but not in a comprehensive manner.

Proposed Bylaw:

Provides greater clarity and detail in terms of the general and specific responsibilities of owners, managers and occupiers of premises, and of waste collectors and waste operators.

Feedback:

- The ERG fully supports greater clarity for stakeholders throughout the waste generation and collection cycle. Achieving region wide waste reduction goals requires all stakeholders to play their part, and this needs to be clarified and supported by regional councils as a whole.
- In providing that information to stakeholders, ERG recommends that they are simultaneously informed about the status of Wellington's current waste behaviours, both nationally and globally, as context. NZ is the worst in the OECD for Municipal Waste.³

³[Waste - Municipal waste](#)

Licensing of waste collectors and operators

Current bylaw:

There are no requirements for licensing of service providers/operators.

Proposed Bylaw:

Introduces a mandatory registration (licensing) system for waste collectors and waste operators to enable Council to:

- effectively regulate private collection services to ensure they are aligned with the WMMP and Council's waste management objectives;
- collect better data on waste streams, waste management and service operations; and
- fulfil its responsibilities to promote effective and efficient waste management and minimisation.

A two-year delay is proposed before the provisions come into effect to allow the Council, along with other Councils in the Wellington region, to establish an appropriate regional system (and resourcing) to manage the applications and data collected.

Feedback:

- The region is currently not on track to achieve the goals of the WMMP. The ERG urges councils to establish and resource this new system within 12 months rather than two years. This still only leaves four years to achieve the WMMP regional waste reduction targets by 2026.
- Collection of objective data is critical, and should not only rely on waste collectors and operators to do the reporting. The reporting system should ensure consistency across all waste streams for a range of indicators, including methane, and carbon emissions.
- Annual reporting should require a minimisation plan in line with regional targets.
- Early stakeholder engagement and collaboration with operators in designing the reporting system is critical.
- Consideration of incentivisation is needed. It's important that collectors are incentivised to achieve goals in reduction, diversion and reuse.
- How can collectors be positively incentivised to achieve the WMMP goals?

Waste management for multi-unit developments

Current bylaw:

There are no requirements for dealing with waste generated by multi-unit developments.

Proposed Bylaw:

Multi-unit developments (defined under the proposed Bylaw as 10 or more residential units) such as apartments, townhouses, retirement villages and gated communities can be problematic in terms of waste management and minimisation, particularly if inadequate provision is made for waste storage and servicing within the development. The proposed provisions are intended to encourage appropriate planning and provision for waste management in all multi-unit developments, and ensure adequate provision is made for waste management facilities and servicing in new multi-unit developments.

In addition, a supporting control is being proposed that will limit the future provision of Council-provided collection services for new multi-unit developments of 10 or more.

Feedback:

- ERG fully supports the requirement to plan for adequate waste management at the building design stage as a requirement of consent.
- We are not convinced that the limit of 10+ units requiring adequate waste facilities is sufficient. The very successful waste management programme in San Francisco City⁴ uses 6 units as the minimum measure, for example.
- The ERG does not support council no longer providing waste collection services to new multi-unit dwellings of 10+ units. Commercial waste providers have no more power than the council to enforce proper sorting, placement, provision of waste facilities in these developments. There is a high risk of a commercial contractor withdrawing services due to hygiene and safety concerns, resulting in the council having to step in regardless.
- Instead, it's suggested WCC provides innovative methods for waste collection at these developments to solve this issue.

For example; this card-operated domestic collection system in Ljubljana provides separation facilities to residents, and is more efficient for waste operators. Ljubljana has reduced waste to landfill by 80% since 2008, sending 115kg per resident to landfill per year. For comparison, 608kg are sent to landfill per person in the Wellington region.⁵

⁴[Recycling & Composting in San Francisco - FAQs](#)

⁵[From no recycling to zero waste: how Ljubljana rethought its rubbish](#)

Not only do these systems improve waste separation, but reduce collection frequency, therefore reducing carbon emissions, reduce traffic congestion, and in the long-term are more economical to operate.⁶



- It's recommended that WCC maintains servicing at these existing and problematic sites in order to retain the greatest control ability to achieve waste minimisation.

⁶[No wheelie bins to be seen as UK's largest underground bin system takes first load](#)

Waste management for events

Current bylaw:

There are no regulatory requirements for dealing with waste generated by events.

Proposed Bylaw:

The provisions provide the ability to manage waste at events and ensure adequate provision is made for waste management. Requires the preparation of a waste management plan (for approval by Council) for public events of a significant scale (an expected attendance of 1,000 or more people over its duration) that will generate waste (exceptions apply). The intent is to encourage better planning and management of waste and to ensure adequate provision is made for waste management facilities and services for events. The proposed one year delay in the commencement of these provisions allows Council to work in partnership with the other Wellington councils to establish appropriate guidance and resourcing to support event managers, and the collection and analysis of the waste data provided.

Feedback:

- This measure is fully supported for the following reasons:
 - Waste infrastructure is readily available to divert various event waste stream from landfill
 - This fits in with current requirements for a health and safety risk assessment so is 'best practice'
- It's recommended to provide typical event waste volumes per person, and encourage targets for waste reduction for the applied event and future events in line with regional minimisation targets.
- Supporting material should be consistent across the Wellington region (e.g. signage colours and collection separation types, in order to simplify messaging and waste diversion).
- It is essential WCC champions these rules for its own events.
- Rather than delay for 12 months, WCC could immediately alert all event organisers that any forthcoming events are expected to include high-quality waste management systems, together with some interim guidelines that could be trialled.

Management of construction and demolition (C&D) waste

Current bylaw:

There are no requirements for dealing with waste generated by C&D activities.

Proposed Bylaw:

Waste generated from construction and demolition activities can be a significant issue. The provisions provide the ability for Council to make a control to require the preparation of a waste management plan (for approval by Council) for building work over a certain specified dollar value (as set by Council). The focus is on high value builds that generate a lot of waste. Providing the ability for Council to set a control to require the preparation of a waste management plan for high value builds aims to reduce waste by encouraging the consideration of waste issues early in the building/ construction process. It also supports the WMMP objectives for construction and demolition waste.

It will help improve local and regional data on the management of construction and demolition waste, encourage reuse and recycling, and help ensure residual materials are taken to an appropriate disposal or recovery facility. Better data will also support increased understanding of construction and demolition waste issues and will inform and support the development of appropriate tools to help manage the issues.

A supporting control is being proposed that will require a C&D waste management plan for projects with an estimated value of \$2 million or greater.

Feedback:

- The average cost to build a dwelling in the Wellington region is \$435k ⁷, meaning most current house builds sit outside of this regulation.
- The \$2 million threshold for C&D projects to require waste plans is too high. The ERG would like to see the bylaw covering all building work requiring a consent. This is because Wellington is growing rapidly, and set to continue growing for several decades, so it's important to capture all building work now, within this bylaw.
- While setting a clear goal for all works needing consent to require a waste management plan by 2026, a phased or graduated approach that allows less impactful builds to make these changes over time might be feasible. For example, a simpler plan could be required for work under \$250k, and a more detailed plan required for works above this level.

⁷[Cost Of Building A House NZ: What's The Average Cost?](#)

- A measure should be included to link construction management plans with improvements in availability of C&D material recovery.
- We encourage regional councils and industry leaders to investigate opportunities for collaboration on reduction, diversion, and reuse of C&D waste streams. For example; a Wellington region C&D industry + council waste forum.
- Requiring a waste management plan is only part of the solution; reduction and reuse targets should also be included.
- To achieve the WMMP waste reduction goals, industry and councils should increase availability and access to material recovery infrastructure. For example:
 - Gypsum recovery for waste gip board
 - Asphalt recovery
 - Concrete to aggregate recovery
 - Treated and non-treated timber processing
 - Usable construction material recovery, e.g. Reusable fixtures, fittings, and components
- To enable greater reuse of materials, WCC should request that MBIE adjust consenting rules to enable easier incorporation of reused materials. Currently these must be stockpiled in advance so that projects can specify exactly what they will be using. This prohibits growth in this market.
- Incentives for construction companies to 'do the right thing' is lacking. This is necessary to achieve buy-in from construction companies.
- WCC should require their own projects, (for example the Central Library Development) to achieve best-practice levels of waste minimisation and reuse.
- We encourage WCC to request necessary changes to building rules in order to achieve WMMP targets. For example; regulation of insinkers.

Management of unaddressed mail and advertising material

Current bylaw:

There are no requirements for dealing with waste, litter and nuisance issues generated by unaddressed mail and advertising material.

Proposed Bylaw:

Unaddressed mail and advertising material can generate significant amounts of waste and can create litter issues. The proposed provisions support and enable the Council to regulate and take action on waste and litter issues that are caused by unaddressed mail and advertising material.

Feedback:

- This bylaw is fully supported by the ERG.
- Guidance should be readily available on the WCC website for advertisers to choose materials fit for recycling infrastructure across the Wellington region.

References

C&D waste and recycling systems for small to medium construction sites:

<https://www.envirowaste.co.nz/news/separation-at-source-key-to-construction-waste-minimisation/>

San Francisco's Mandatory Recycling and Composting Ordinance:

<https://sfenvironment.org/recycling-composting-fags>

Cost to build a home in Wellington:

<https://www.canstar.co.nz/home-loans/otago-expensive-region-build-new-nz-home/>

Cardinia Shire Council - Waste rebates and discounts

https://www.cardinia.vic.gov.au/info/20002/rubbish_and_recycling/147/waste_rebates_and_discounts?fbclid=IwAR2BeiTS-SjcSj2ldm2noF4Uc3uFV41Ne42sneeTQCEEvLvNmkkmDOAIEbY#section-4-apply-for-a-waste-rebate-

Reuse of building materials:

<http://www.level.org.nz/material-use/minimising-waste/reuse-and-recycling/>

Recycling and Composting in San Francisco:

<https://sfenvironment.org/recycling-composting-fags>

Alternative waste and recycling collection systems for inner city residents in Ljubljana, Slovenia:

<https://www.theguardian.com/cities/2019/may/23/zero-recycling-to-zero-waste-how-ljubljana-rethought-its-rubbish>

Underground waste and recycling collection systems in Cambridge, UK:

<https://resource.co/article/no-wheelie-bins-be-seen-uk-s-largest-underground-bin-system-takes-first-load-12143>

Proposed Solid Waste Management and Minimisation Bylaw 2020 submission form

Absolutely Positively
Wellington City Council
Me Heke Ki Pōneke

We want to hear your views on the Proposed Solid Waste Management and Minimisation Bylaw 2020. You can answer these questions online at wellington.govt.nz/waste-bylaw, email your thoughts to policy.submissions@wcc.govt.nz or post this form to us (no stamp needed). Have your say before 5pm, Friday 25 September 2020.

Privacy statement - what we do with your personal information

All submissions (including names but not contact details) are provided in their entirety to elected members, and will be made available to the public at our office and on our website. Your personal information will also be used for the administration of the consultation process, including informing you of the outcome of the consultation.

All information collected will be held by Wellington City Council, 113 The Terrace, Wellington. Submitters have the right to access and correct their personal information.

Section 1 - your details

Your name*:	Bernard O'SHAUGHNESSY
Your email or postal address*:	[REDACTED]
You are making this submission:	
<input checked="" type="checkbox"/> as an individual	
<input type="checkbox"/> on behalf of an organisation. Your organisation's name:	
Would you like to make an oral submission to the Councillors? (Oral submissions will be held on Thursday, 22 October 2020.)	
<input checked="" type="checkbox"/> Yes	
<input type="checkbox"/> No	
If yes, please give your phone number so that a submission time can be arranged*: *mandatory field	

Section 2 - questions about the Proposed Solid Waste Management and Minimisation Bylaw 2020

1. Multi-unit dwellings						
The Council is proposing that all new large multi-unit developments (comprising of 10 or more dwellings), provide adequate space for the storage and collection of all waste generated within that development. The Bylaw also requires a related waste management plan to be submitted to the Council prior to building construction. This plan will need to demonstrate, amongst other things, how waste material generated on site will be minimised.						
	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Don't know
To what extent do you agree or disagree with the proposed Bylaw requirements regulating waste management and minimisation planning for multi-unit dwellings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

6. Proposed Bylaw controls

A new set of bylaw controls is also proposed that may affect how you dispose of your waste and recycling. Amongst other things, these controls regulate waste and recycling servicing and collection times, restrict servicing access for new multi-unit developments (of 10 or more dwellings), restrict access on private roads and on roads where there are operational limitations, restrict the amount of green waste permitted within Council waste receptacles, and prohibit a range of dangerous or potentially hazardous material from being deposited into kerbside waste bags or containers. The controls also introduce a new set of waste separation standards for users of the Southern Landfill.

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Don't know
To what extent do you agree or disagree with the proposed bylaw controls?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

7. Are there any other comments you would like to make about the proposed Bylaw and/or the proposed Bylaw controls?

Yes

a) this proposal should have been more strongly pushed - its very important

b) we have to focus on source source of waste more, rather than collection issues

c) Put recycle bins @ supermarkets

d) change producers of waste eg. supermarkets, large firms, Bunnings, warehouse to junk mail (put Levy on)

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
Feedback

Submitter: Yew Ho

Suburb: Karori

On behalf of: An individual

117

Q1. You are making this submission as: Individual

Q2. Would you like to make an oral submission to the Councillors on Thursday, 22 October 2020? Yes

Q3. Multi-unit dwellingsThe Council is proposing that all new large multi-unit developments (comprising of 10 or more dwellings), provide adequate space for the storage and collection of all waste generated within that development.The Bylaw also requires a related waste management plan to be submitted to the Council prior to building construction. This plan will need to demonstrate, amongst other things, how waste material generated on site will be minimised.

To what extent do you agree or disagree with the proposed Bylaw requirements regulating waste management and minimisation planning for multi-unit dwellings? Definitely disagree

Q4. Event waste managementThe Bylaw seeks to regulate waste management and minimisation when planning a large event of 1000+ people. An event is proposed to include any organised temporary activity of significant scale that is likely to create litter and includes (but is not limited to) an organised outdoor gathering, open-air market, parade, sporting event, protest, festival, concert or celebration.While indoor private functions, indoor performances and regularly occurring recreational activities such as sports events are excluded from this standard, other event organisers will be required to submit an event management plan to the Council for approval prior to the event.The plan would need to demonstrate: (1) how waste generated by the event is to be minimised; (2) the steps that will be taken to maximise the use of reusable systems, recycling and composting; and (3) the proposed method for minimising and capturing litter associated with the event.

To what extent do you agree or disagree with the proposed event waste management and minimisation standards for? Definitely disagree

Q5. Construction and demolition waste managementThe proposed Bylaw and associated Bylaw controls requires all large construction projects (valued at \$2 million+) to consider waste management and minimisation planning as part of their project planning and submit an associated construction site and demolition waste management plan to the Council for approval.Amongst other things, this plan will need to set out: (1) the proposed method of waste management for each type of waste (e.g. reuse, recovery, recycling, disposal); and (2) the proposed method for minimising and capturing litter associated with the project and the building work.

To what extent do you agree or disagree with the proposed requirement to consider waste management and minimisation planning for high value building projects? Somewhat agree

**Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
 Feedback**

- Q6. Restricting unaddressed and advertising mail**The Bylaw proposes to formally restrict the deposit of unaddressed mail or advertising mail in letter boxes that are clearly marked with the words "no circulars", "no junk mail" or "addressed mail only". There are exceptions for public notices from the government, as well as for different types of information from community organisations and charities.

To what extent do you agree or disagree with this new restriction? Definitely disagree

- Q7. Waste Operator licensing**The Council has proposed to establish Waste Operator licensing. This would involve mandatory licensing for any person or entity that collects or transports more than 20 tonnes of waste per year within the Wellington City District. Licensing would not apply to individuals who collect or transport waste for personal reasons. The primary purpose of this proposed licensing system is for the Council to collect relevant waste-related data from the private sector and to ensure private waste operators are operating in a manner that is consistent with the Council's waste-related objectives.

To what extent do you agree or disagree with the establishment of waste operator and facility licensing? Definitely disagree

- Q8. Proposed Bylaw controls**A new set of bylaw controls is also proposed that may affect how you dispose of your waste and recycling. Amongst other things, these controls regulate waste and recycling servicing and collection times, restrict servicing access for new multi-unit developments (of 10 or more dwellings), restrict servicing access on private roads and on roads where there are operational limitations, restrict the amount of green waste permitted within Council waste receptacles, and prohibit a range of dangerous or potentially hazardous material from being deposited into kerbside waste bags or containers. The controls also introduce a new set of waste separation standards for users of the Southern Landfill.

To what extent do you agree or disagree with the proposed bylaw controls? Definitely disagree

- Q9. Are there any other comments you would like to make about the proposed Bylaw and/or the proposed Bylaw controls?**

The post box has nothing to do with the council and nothing in it is a waste product until it is disposed into a BIN. No amount of bye law writing can make it part of the purview of the Council. The post box even when it is full to the top is still not a waste product for the Council to regulate UNTIL someone dumps the lot into a bin. The council do not collect trash from the post box currently. I object to anyone classifying post box contents as TRASH until it is in a waste bin. Owners can take it and return to New world, Countdown, etc..for someone else to use. There is no need to deal with contents as waste. That would be ecology right to do! On the above and others proposed, I am happy to speak on.

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
Feedback

Submitter: Steve Cosgrove
Suburb: Newtown
On behalf of: An individual

153

- Q1. You are making this submission as: Individual
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- Q2. Would you like to make an oral submission to the Councillors on Thursday, 22 October 2020? not answered
-
- Q3. Multi-unit dwellingsThe Council is proposing that all new large multi-unit developments (comprising of 10 or more dwellings), provide adequate space for the storage and collection of all waste generated within that development.The Bylaw also requires a related waste management plan to be submitted to the Council prior to building construction. This plan will need to demonstrate, amongst other things, how waste material generated on site will be minimised.
- To what extent do you agree or disagree with the proposed Bylaw requirements regulating waste management and minimisation planning for multi-unit dwellings? Definitely agree
-
- Q4. Event waste managementThe Bylaw seeks to regulate waste management and minimisation when planning a large event of 1000+ people. An event is proposed to include any organised temporary activity of significant scale that is likely to create litter and includes (but is not limited to) an organised outdoor gathering, open-air market, parade, sporting event, protest, festival, concert or celebration.While indoor private functions, indoor performances and regularly occurring recreational activities such as sports events are excluded from this standard, other event organisers will be required to submit an event management plan to the Council for approval prior to the event.The plan would need to demonstrate: (1) how waste generated by the event is to be minimised; (2) the steps that will be taken to maximise the use of reusable systems, recycling and composting; and (3) the proposed method for minimising and capturing litter associated with the event.
- To what extent do you agree or disagree with the proposed event waste management and minimisation standards for? Definitely agree
-
- Q5. Construction and demolition waste managementThe proposed Bylaw and associated Bylaw controls requires all large construction projects (valued at \$2 million+) to consider waste management and minimisation planning as part of their project planning and submit an associated construction site and demolition waste management plan to the Council for approval.Amongst other things, this plan will need to set out: (1) the proposed method of waste management for each type of waste (e.g. reuse, recovery, recycling, disposal); and (2) the proposed method for minimising and capturing litter associated with the project and the building work.
- To what extent do you agree or disagree with the proposed requirement to consider waste management and minimisation planning for high value building projects? Definitely agree
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**Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
 Feedback**

- Q6. Restricting unaddressed and advertising mail**The Bylaw proposes to formally restrict the deposit of unaddressed mail or advertising mail in letter boxes that are clearly marked with the words "no circulars", "no junk mail" or "addressed mail only". There are exceptions for public notices from the government, as well as for different types of information from community organisations and charities.

To what extent do you agree or disagree with this new restriction? Somewhat agree

- Q7. Waste Operator licensing**The Council has proposed to establish Waste Operator licensing. This would involve mandatory licensing for any person or entity that collects or transports more than 20 tonnes of waste per year within the Wellington City District. Licensing would not apply to individuals who collect or transport waste for personal reasons. The primary purpose of this proposed licensing system is for the Council to collect relevant waste-related data from the private sector and to ensure private waste operators are operating in a manner that is consistent with the Council's waste-related objectives.

To what extent do you agree or disagree with the establishment of waste operator and facility licensing? Definitely agree

- Q8. Proposed Bylaw controls**A new set of bylaw controls is also proposed that may affect how you dispose of your waste and recycling. Amongst other things, these controls regulate waste and recycling servicing and collection times, restrict servicing access for new multi-unit developments (of 10 or more dwellings), restrict servicing access on private roads and on roads where there are operational limitations, restrict the amount of green waste permitted within Council waste receptacles, and prohibit a range of dangerous or potentially hazardous material from being deposited into kerbside waste bags or containers. The controls also introduce a new set of waste separation standards for users of the Southern Landfill.

To what extent do you agree or disagree with the proposed bylaw controls? Somewhat agree

- Q9. Are there any other comments you would like to make about the proposed Bylaw and/or the proposed Bylaw controls?**

The Council needs to lead the way towards a situation those who create the waste, (retailers, food suppliers etc) need to meet the financial cost of getting rid of that waste. This needs to be regulated so that all creators are on the same challenge. They can recover costs from their customer I find it hard to see that 30 days will be long enough for a waste management plan to be evaluated by Council. I suggest 60 days for events of 1000+ people, raising to 90 days for 10,000+ people. Indoor events also create waste, affecting the environment. Indoor events should also be regulated,

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
Feedback

Submitter: Christine Davies
Suburb: Not Stated
On behalf of: An individual

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Q1. You are making this submission as: Individual

Q2. Would you like to make an oral submission to the Councillors on Thursday, 22 October 2020? Yes

Q3. Multi-unit dwellings The Council is proposing that all new large multi-unit developments (comprising of 10 or more dwellings), provide adequate space for the storage and collection of all waste generated within that development. The Bylaw also requires a related waste management plan to be submitted to the Council prior to building construction. This plan will need to demonstrate, amongst other things, how waste material generated on site will be minimised.

To what extent do you agree or disagree with the proposed Bylaw requirements regulating waste management and minimisation planning for multi-unit dwellings? Definitely agree

Q4. Event waste management The Bylaw seeks to regulate waste management and minimisation when planning a large event of 1000+ people. An event is proposed to include any organised temporary activity of significant scale that is likely to create litter and includes (but is not limited to) an organised outdoor gathering, open-air market, parade, sporting event, protest, festival, concert or celebration. While indoor private functions, indoor performances and regularly occurring recreational activities such as sports events are excluded from this standard, other event organisers will be required to submit an event management plan to the Council for approval prior to the event. The plan would need to demonstrate: (1) how waste generated by the event is to be minimised; (2) the steps that will be taken to maximise the use of reusable systems, recycling and composting; and (3) the proposed method for minimising and capturing litter associated with the event.

To what extent do you agree or disagree with the proposed event waste management and minimisation standards for Somewhat agree

Q5. Construction and demolition waste management The proposed Bylaw and associated Bylaw controls requires all large construction projects (valued at \$2 million+) to consider waste management and minimisation planning as part of their project planning and submit an associated construction site and demolition waste management plan to the Council for approval. Amongst other things, this plan will need to set out: (1) the proposed method of waste management for each type of waste (e.g. reuse, recovery, recycling, disposal); and (2) the proposed method for minimising and capturing litter associated with the project and the building work.

To what extent do you agree or disagree with the proposed requirement to consider waste management and minimisation planning for high value building projects? Definitely agree

Submissions on the Proposed Solid Waste Management & Minimisation Bylaw 2020:
 Feedback

- Q6. Restricting unaddressed and advertising mail**The Bylaw proposes to formally restrict the deposit of unaddressed mail or advertising mail in letter boxes that are clearly marked with the words “no circulars”, “no junk mail” or “addressed mail only”. There are exceptions for public notices from the government, as well as for different types of information from community organisations and charities.

To what extent do you agree or disagree with this new restriction? Neither agree nor disagree

- Q7. Waste Operator licensing**The Council has proposed to establish Waste Operator licensing. This would involve mandatory licensing for any person or entity that collects or transports more than 20 tonnes of waste per year within the Wellington City District. Licensing would not apply to individuals who collect or transport waste for personal reasons. The primary purpose of this proposed licensing system is for the Council to collect relevant waste-related data from the private sector and to ensure private waste operators are operating in a manner that is consistent with the Council’s waste-related objectives.

To what extent do you agree or disagree with the establishment of waste operator and facility licensing? Somewhat disagree

- Q8. Proposed Bylaw controls**A new set of bylaw controls is also proposed that may affect how you dispose of your waste and recycling. Amongst other things, these controls regulate waste and recycling servicing and collection times, restrict servicing access for new multi-unit developments (of 10 or more dwellings), restrict servicing access on private roads and on roads where there are operational limitations, restrict the amount of green waste permitted within Council waste receptacles, and prohibit a range of dangerous or potentially hazardous material from being deposited into kerbside waste bags or containers. The controls also introduce a new set of waste separation standards for users of the Southern Landfill.

- Q9. Are there any other comments you would like to make about the proposed Bylaw and/or the proposed Bylaw controls?**

Where is green waste collection question in the consultation. Green waste collection is needed in Wellington.