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To: Greater Wellington Regional Council and Porirua City Council

**From: Te Awa-o-Porirua Catchment and Community Trust and
The Guardians of Pāuatahanui Inlet**
Contacts: Michael Player and Lindsay Gow

**Submission: on the Wellington Region Waste Management and Minimisation Plan
2023 - 2029**

This submission is made on behalf of Te Awarua o Porirua Catchments and Community Trust (PHACCT) and the Guardians Of Pāuatahanui Inlet (GOPI).

We support strongly the regional and locality specific focus on actions that will enhance the environment and especially the health of Te Awarua-o-Porirua and surrounding catchments.

Our comments on proposed policies as well as suggestions for further actions are as follows:

Regional

We **support** the targets and timelines proposed in the regional proposals to reduce the total amount of material that needs final disposal to landfill by 10% by 2027 and 30% by 2030. The sub targets seem well conceived and ambitious but do-able so long as funding can be identified and allocated:

- Ensuring a regional construction and demolition processing facility is available by 2026
- Ensuring a regional organics processing facility is available by 2029
- Ensuring three new resource recovery facilities are established in the Wellington region
- Reducing emissions from biogenic methane by reducing the total amount of organic waste disposed to landfill by 50% by 2030.
- Reducing emissions from the transport of waste by 30% by 2030.
- Ensuring all urban households have access to kerbside recycling collections by 2027
- Ensuring food scraps collection services are available to urban households by 2030
- For each council to engage with and commit 20% of the business community to minimise waste.

We consider that the proposal that “each council to engage with and commit 20% of the business community to minimise waste” is too timid and unspecific. We **propose** that the objective should be to engage with 100% of the business community and to gain specific commitments from “major” waste generators (as measured by landfill contributions). Commitments could, for instance, be obtained by way of signed accords with substantial construction and contractors to minimise over ordering of building supplies, to maximise use of ordered supplies and to recycle any products left over at the completion of projects.

Te Awarua-o-Porirua harbour is an end point “collector” for waste and litter from within both Wellington and Porirua cities. Much of this is carried by waterways and wind and is deposited in the harbour and along the shorelines.

In the period 2019-2021, surveys of beaches near the Porirua Stream mouth in the Onepoto Arm of the harbour and the small beach near Paremata Bridge, regularly recorded high volumes of litter with plastic comprising more than 80% of the total waste and litter collected (source: [Litter intelligence.com](https://www.litterintelligence.com)). Litter is one of the most visible of the contaminants and can impact/affect the birds, animals, recreational use and ecology of the area. Another worrying contaminant is the disposal of liquids such as paints, oils, weedkillers and non-biodegradable detergents into stormwater drains.

We are **concerned** that the draft plan is almost silent on actions to reduce waste at source. There seems to be an inordinate emphasis on managing waste and litter after it has entered the waste stream. We believe that reducing the amount of packaging and managing waste at source will bring the greatest gains.

We consider that industry, especially the manufacturers and users of food product containers could improve quite significantly the labelling of their products with the plastic type. We note that on many containers the plastic type number within the triangle is almost so small as to be illegible/non-discernible. The consequence of that is that many people seem to ignore the “number” and either discard the container or put in the recycling bins and “hope”. That simply leads to costs on the councils for sorting and/or rejection of many loads of collected waste.

We **recommend** that a specific action include councils jointly and separately encouraging manufacturers to make their containers more user-friendly for recycling.

We appreciate that, in the meantime, management and clean-up of waste is important to protect the environment.

A Ministry for the Environment/StatisticsNZ report on the state of the marine environment in 2019 observed that “New Zealand does not have a national strategy for managing new or emerging contaminants, and monitoring is limited and inconsistent. Our understanding of the sources, ranges, and effects of pollutants on our marine environment and on people lags behind their introduction and programmes for their recycling. We understand, for example, that vaping products are an emerging waste concern; a recent media reports of a truck fire arising from vaping batteries is an example.

We **propose** that the report and locality-specific action plans refer specifically to emerging contaminants.

We **support** the proposed organic collection project. Nevertheless, we believe that consideration should be given to advancing the 2030 timeframe. While we note fiscal constraints are significant, more detail on implementation would assist in understanding better the constraints to advancing this timeline (for example, is it the building of the required infrastructure or fiscal?)

We acknowledge the influence that human behaviour has on waste and litter contamination and prevalence. We believe that some of the concerns with litter can be attributed to inconsistent rules and messages from regulatory authorities in the region. There are two examples:

- messages around the type and nature of plastic that can be recycled and which councils will collect which plastic types are inconsistent and changing. This may, in part, reflect the absence of recycling facilities but should, in itself, be a driver to better consistency. It is our view that inconsistent and changing “rules” drive people away from improving waste management behaviours.
- Lack of clarity and consistency around recycling of Number 5 plastics. Manufacturers using this type of plastic increasingly use it for tops and the container itself. Council messages are that tops are not recyclable. This means that these types of small object are found in the harbour environment - our personal observations of waste and litter along the harbour edge in the Pāuatahanui Inlet support this view.

Funding

We **recommend** that the funding aspect of the WMMP be expanded upon to bring greater transparency and more discussion of risks.

A description of potential sources to implement the action plans is continued in Section 7 of the WMMP. It would be extremely helpful for the report to examine in more detail the potential costs of the regional and council action plans and the balance between funding sources. For example, 5 potential funding sources are identified but there is no indication of how much councils might need to rely on each source.

More detailed funding information should be supplied so that submitters can gain an appreciation of the funding gap that might exist between current spending and future spending on enhanced services. All councils in the region face cost pressures not least water infrastructure and the regional targets to 2030 are quite substantial. In the absence of more information on funding it is difficult to assess how realistic those targets might be.

We note that regional and council-specific funding for the myriad of projects will need to be considered by councils in their upcoming Long-Term Plans. This will be a difficult exercise recognising that all councils have pressure on resources, funding and competing priorities. It is unclear from the WMMP whether councils have agreed to a coordinated approach to funding with in their LTPs or whether each council will advance its own waste management priorities. An uncoordinated approach creates a risk that regionally funded projects might not proceed because one or more councils do not regard it as a priority.

Porirua

We **endorse** Porirua City Council's overall actions of:

- Building relationships and connections across business sector and communities to increase learning and drive commitment in waste reduction.
- Developing a network of facilities to reuse, repurpose, recycle, and compost goods and materials.
- Improving our kerbside service to be low emissions, accessible and equitable.
- Providing and implementing an organic collection and a processing service to divert organic waste.

Nevertheless, in contrast to the regional plan and actions, the proposed Porirua action plan is underwhelming. The proposed actions are vague and lack substance and specificity. For example, only 3 of 31 Actions in the PCC Action Plan have definite timelines and all others are vague in expectations. In addition, 21 of the actions identify the Waste Levy as a potential funding source and, in the absence of any useful financial information it is difficult to determine whether this level of reliance on the waste levy is realistic. Further, the division of funds between rates and levies is unclear.

We **propose** the addition of the following substantive actions:

- **Include** a document or table with more specific deliverables including specific targets, timelines and priorities. In our view and given council resources and competing priorities, it is impossible to do all the things listed even within the vague timelines set out.
- **Consistent** with our earlier observations concerning the need to minimise waste at source we **urge** the council to include an **Action** to advocate strongly to central government to develop legislation and practice requirements to avoid and minimise waste at source - that is in the production and distribution systems of the economy.

The council refers to a circular economy which is conceptually excellent nevertheless we question the extent to which this could be achieved in Porirua or even in the region without strong central government leadership.

- **Include** an Action **expanding** the number of sites in Porirua City reporting within the Litter Intelligence Platform. We propose that the council expand this very useful and informative data collection and network and, especially, extend it to businesses that contribute significantly to litter in the city and the harbour (takeaways, plastics.) The data obtained in the surveys that are found on the Litter Intelligence Platform provide a factual basis for determining which specific actions would improve the health of the harbour and catchments.
- Porirua City Council to **revive or reinvigorate** it's "Source to Sink" initiative to establish the main sources of litter, whether deliberately thrown away or due to poor waste disposal, and windblown into the storm water system, streams and harbour, so that they can target their efforts in stopping the litter at its source.
- **Identify and install** suitable stormwater litter traps on large stormwater outlets into the harbour provided that those traps that do not create fish barriers - along with the allocation of resources for maintenance to remove the trapped rubbish for appropriate disposal.
- We **commend** the actions of retailers such as Resene for running old paint drop off points and the actions of a local Porirua small business last summer to remind tradies and DIY painters alike not to wash brushes or paint trays into gutters or storm water grates. The Council should provide leveraging power and enter into partnerships with businesses and community groups for such behavioural campaigns.

Conclusion

Litter and its management is an ongoing policy and operational concern for Te Awarua-o-Porirua. We are not convinced that the proposed regional and Porirua-specific policies and actions will lead to a significant change within the life of the proposed WMMP. Not least, the proposed regional targets and timelines appear "heroic" in the context of competing pressure on council funding and the fact that councils develop their long-term funding plans separate from each other.

The proposed WMMP contains conceptually desirable objectives and targets. In the context of Porirua city, however, we believe that ambition and, perhaps, the desire to be seen to be "doing the right thing" obscures the valid question whether the council's proposals are achievable - more specificity is sought.

A WMMP is, in effect, an operational response for managing waste and litter. We reiterate our concern on the importance minimising waste at source. This places the financial responsibility onto the producers of the waste at source rather than regional and local ratepayers and residents. We propose that the WMMP give more weight on regional advocacy to central government to develop legislation and practice requirements to avoid and minimise waste at source - that is in the production and distribution systems of the economy.

We do wish to be heard



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