

Summary of Submissions on the Draft Auckland Waste Management and Minimisation Plan 2024

Introduction

On 30 November 2023, The Planning, Environment and Parks Committee of Auckland Council approved the draft Waste Management and Minimisation Plan (draft WMMP) 2024 for public consultation (refer [PEPCC/2023/165](#)). The draft WMMP was a review of the 2018 Waste Management and Minimisation Plan; informed by research and findings of the Waste Assessment 2023 and input and information from a variety of groups prior to wider public consultation. This included information from mana whenua and maatawaka, councillors, local boards, community waste-wise partners and community recycling centre operators, including stakeholders from the commercial sector and from the Auckland Council Group.

Consultation Process

The process for consultation followed special consultative procedure requirements of the Local Government Act 2002 which was open for public feedback from 28 February to 28 March 2024. This included a publicity campaign to spread the word to the public through digital, print and radio platforms, alongside working through our community partners and business contacts and through council's channels (e.g. social media, OurAuckland and the People's Panel). Work with our community partners included workshops with mataawaka partners, a wider workshop with partners leading our community education programmes, and workshops with stakeholder groups on Waiheke and Aotea Great Barrier.

Staff continued to work with iwi including re-issuing the invitation to engage. Workshops were also held with the six demographic advisory panels hosted by the council and a memo was sent to the Rural Advisory Panel to help spread the word on the consultation.

The draft WMMP (including Hauraki Gulf Islands plan), along with Waste Assessment 2023, the summary of the draft WMMP, and submission feedback forms were made available online via [AKHaveYourSay.nz](#). A document answering frequently asked questions on the fortnightly rubbish collection proposal was provided. Hard copies of all documents were made available at libraries and Have Your Say events. The draft WMMP summary document and feedback form were translated into Māori, Samoan, Tongan, Chinese, Korean, Hindi and New Zealand sign language and made available in an 'easy read' format. Two webinars on the draft plan were held alongside a video introduction to the plan. Two hearing-style events for Māori organisations and regional organisations and interest groups were held in March.

Total Submissions

A total of 2737 submissions were received, including online hardcopy surveys and emails, and verbal submissions at Hearing-style events for organisations. In addition, 'AK Have Your Say' events with the public attracted 1410 responses on various proposals in the draft WMMP, predominantly the

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fortnightly rubbish proposal as this was where staff directed most attention. This included 254 comments recorded at 'AK Have Your Say' events.

Approximately 14 submissions were received late but were able to be included in this summary report. However, two submissions were received too late for inclusion.

The numbers and types of submissions received are shown in the Table 1 below.

Table 1. Submission breakdown

Written submissions	Number
Council's submission feedback form (online and hard copy)	2697
Email submissions	37
Verbal submissions	
Have Your Say – Hearing Style event (of which 8 also submitted online)	11 presentations (3 additional)
Have Your Say event polls on level of support for specific questions	1156 responses*
Have Your Say event comments	254 comments**
Total Submissions	2737 submissions
Total Responses from HYS Public Events	1410 responses

*Polls at events were taken informally on blackboards (fortnightly collections only) or by placing a token in a box. They were based up to one, two or three of the questions in the feedback form, and asked eventgoers whether they supported, did not support or were unsure on that proposal/those proposals.

**Comments at events were recorded by staff without seeking personal or demographic data.

Organisational submissions



Figure 1. Submissions were received from 105 organisations.

Key demographics of submitters

The feedback form included optional fields for demographic data. Figure 2 shows the ethnicities selected by submitter and Figure 3 shows the age and gender of submitters. Each figure shows a comparison with 2018 census data.

Summary of submissions on the draft WMMP

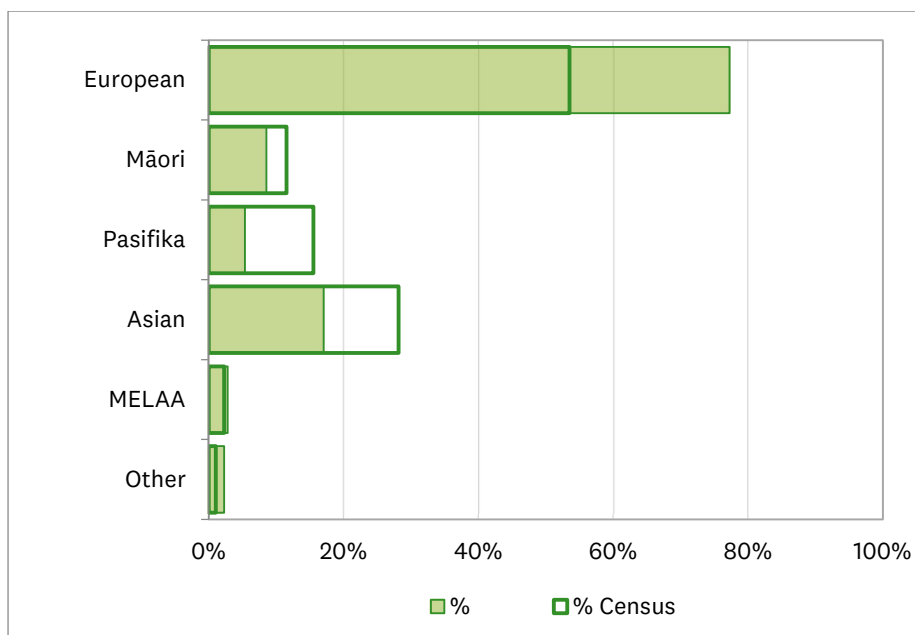


Figure 2. Ethnicities by draft WMMP submitter compared to 2018 census data

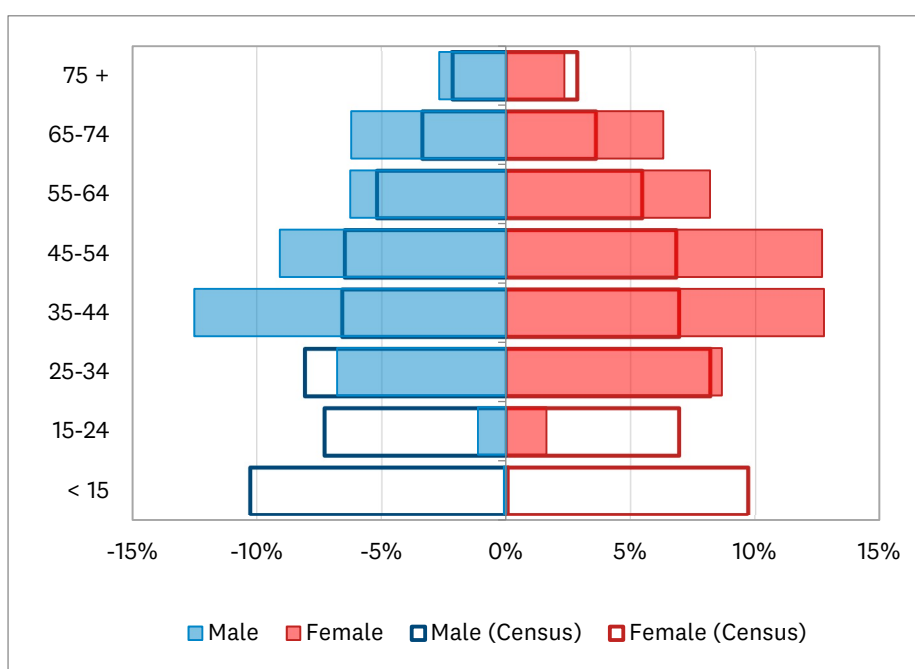


Figure 3. Age and gender by draft WMMP submitter compared to 2018 Census data

A breakdown of submissions by local board area is shown below in Table 2.

Table 2. Submission by local board area

Local Board	Number of submissions
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Summary of submissions on the draft WMMP

Albert-Eden	280
Aotea/Great Barrier	10
Devonport-Takapuna	117
Franklin	72
Henderson-Massey	143
Hibiscus and Bays	159
Howick	211
Kaipātiki	184
Māngere-Ōtāhuhu	62
Manurewa	77
Maungakiekie-Tāmaki	336
Ōrākei	251
Ōtara-Papatoetoe	70
Papakura	52
Puketāpapa	52
Rodney	115
Upper Harbour	118
Waiheke	31
Waitākere Ranges	80
Waitematā	136
Whau	98
Outside Auckland	15
LB area not specified	68
TOTAL	2737

Methodology in summarising submissions

The submissions received are analysed in the following sections. The analysis is based on the structure of the online feedback form, through which a majority of submissions was received. The form included 11 questions, four of which focussed on the Hauraki Gulf islands. Each section of the following analysis focusses on a single question.

Summary of submissions on the draft WMMP

Submissions from mana whenua and mataawaka organisations, and from other organisations have been reviewed separately as they each offer different perspectives, issues and opportunities on waste.

The online submission form included, for each question, an option for submitters to respond 'Support' or 'Do not support' to the relevant aspect of the draft WMMP. The option also allowed submitters to answer 'Don't know' or 'Other'.

In the following sections, each of the 11 questions is analysed in terms of the themes present in comments. The analysis of each question is divided into two sections, one for comments that had indicated support and the other for those that did not support. This differentiation was made as those in support of a proposal often looked at the question from a different perspective from those who didn't support that proposal.

To simplify the analysis and reduce repetition in the text, the analyses for submissions that answered 'Support' also include the submissions that answered 'Don't know' or 'Other' to the question. The latter two categories are, throughout the analysis, referred to as submissions of 'unspecified' support.

A review of comments for 'Don't know' and 'Other' responses showed that, in general, the same themes were present, in comparable proportions, to the other submissions. There were no discernible patterns of support/don't support found in the submissions of unspecified support. Some of the 'Don't know' comments stated that they did not have enough information to make an informed choice. Some of the 'Other' comments expressed support, but only on a conditional basis, or addressed a relevant issue that was not addressed in the draft WMMP.

In the following analysis, in those instances where specific themes were common in the 'Don't know' or 'Other' responses, these themes are noted in the text.

Question 1 - Direction of the draft WMMP

From the online submissions form:

The draft WMMP focuses on ways to reduce waste being created and sent to landfill, with actions aimed at the top of the 'waste hierarchy', e.g. redesigning, reusing or repairing items. It also supports actions further down the hierarchy, e.g. recycling materials.

The WMMP's goals centre on keeping resources in circulation and minimising harm to the environment and communities from waste

See section 3 of the Snapshot document.

What do you think of this direction? Support, Don't know, Other, Do not support. Tell us why.

Q1 – Summary of feedback

An analysis of the overall level of submitters' support for the direction of the draft WMMP is given in Figure 4. Only those submissions that responded to the question about support and the responses taken at Have Your Say events on this priority have been included in the analysis.

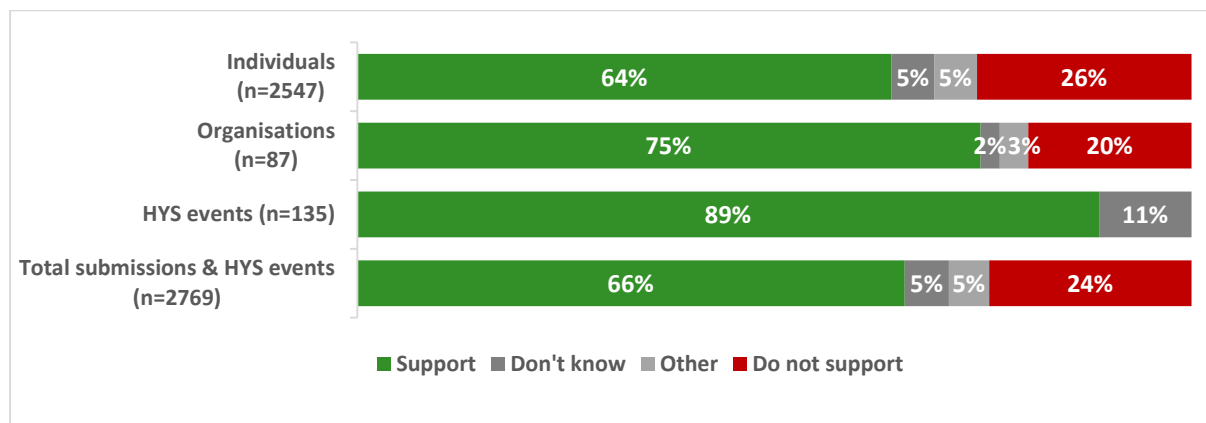


Figure 4. Level of Support - Question 1 - Direction

The level of support from the responses received at AK Have Your Say events was higher than in the written submissions. This difference may be associated with a change in opinion based on a discussion with staff, who were able to highlight the thinking behind the direction underlying the plan.

Summary of key themes

- The importance of aiming higher up the waste hierarchy including within manufacturing, distribution, retail and construction sectors.
- Comments mentioning specific initiatives such as product bans or product stewardship; or particular waste streams like plastics.
- References to a circular economy or similar principles.

- Negative reflections on specific rubbish issues/proposals (fortnightly rubbish collection, the removal of public place litter bins, rates funded rubbish collections, increased costs, unwanted services, the food scraps collection, and the new kerbside recycling standards).

Q1 – Detailed analysis

Submissions supporting or with unspecified support for the direction of draft WMMP

The direction of the draft WMMP was supported by the majority of submitters, including individuals and organisations, and those submitting in writing or providing feedback at HYS events (refer Figure 4 above).

Comments were made by 883 submitters; however approximately 19 per cent of those who chose support or unspecified support did not provide clarification of their position. Overall, approximately one-third of comments related to the importance of aiming higher up the waste hierarchy. Many of these submitters remarked on the importance of the manufacturing, distribution, retail and construction sectors playing a role in waste reduction, often in their role as large waste producers. Some of these comments were at a general level, others identified particular industries, such as packaging manufacturers and supermarkets, as having a role to play. Specific initiatives, such as product bans and extended producer responsibility, were also mentioned, as were specific products, such as plastics. Many submissions referred to the circular economy and similar principles.

A smaller number of comments, approximately 13 per cent, limited their comment to the improvement of particular services or infrastructure that are relevant to the direction of the draft WMMP. Reference was made to the need for more resource recovery facilities and an improvement to kerbside inorganics collections. Specific materials were also identified as being currently difficult to recycle, such as soft plastics, used household goods and e-waste.

Approximately 8 per cent of comments referred to topical issues not directly associated with the question. Many comments referred, mostly in negative terms, to the proposed fortnightly rubbish collection, the removal of public place litter bins, rates funded rubbish collections, increased costs, and the new kerbside recycling standards. These themes are discussed in more detail in other sections.

Many of those that used the 'Other' option supported waste reduction in principle but did not favour the actions proposed by the draft WMMP. Some did not agree with the focus on the top of the waste hierarchy or did not consider zero waste to be a realistic goal. Many expressed the same concerns as those expressing support, mentioning fortnightly rubbish collections and the national recycling standards.

The only theme mentioned several times by those who answered 'Don't know' was that not enough information was available.

Submissions not supporting direction of draft WMMP

The direction for the draft WMMP was not supported by 25 per cent of submissions. Of the 671 submissions that did not support council's direction for the draft WMMP, 376 included comments.

Nearly 60 per cent of the comments that did not support council's direction for the draft WMMP referred to one or more topical issues not directly related to the question. These comments referred, in uniformly negative terms, to the proposed fortnightly rubbish collection, the removal of public place litter bins, rates funded rubbish collections, increased costs, unwanted services, the food scraps collection, and the new kerbside recycling standards. The rationales for these comments are discussed in more detail in other sections.

The large number of comments that were outside of the scope of the question may be associated with it being the first question in the online submissions survey. Respondents completing the online survey may have been taking the first opportunity to express their opinion on matters about which they felt strongly. Many of these comments included wide-ranging complaints related to council's existing waste management services.

Approximately 12 per cent of the comments in submissions that did not support council's direction for the draft WMMP nonetheless recognised the importance of actions focused on the top of the waste hierarchy. Some of these comments stated unqualified support for that focus and others considered this focus, while important, to be beyond council's ability to influence.

Mana whenua and mataawaka organisation views on the draft WMMP direction

Te Ahiwaru reflected on the work they've done with staff to review the plan; and identified the need for future work with mana whenua to strengthen the plan. They suggested combining the separate section on te ao Māori into the principles of the plan. They also made suggestions to re-order parts of the document including placing the principles 'across the plan to arrive at the vision'.

Ngāti Whātua Ōrākei (NWŌ) outlined three key points which they suggest need to be addressed by the plan:

- further work in the waste assessment 2023 and draft WMMP to address commercial waste
- further work to integrate te ao Māori into the plan
- better alignment between the draft WMMP and the Auckland Unitary Plan

They recommend changes to the text of the draft plan, especially to:

- prioritise work towards a Resource Recovery and Infrastructure Plan (action A7), and to strengthen this action to address the gap they see in commercial waste; and
- to describe the role of the Auckland Unitary Plan in land use planning including waste management facilities.

Like Te Ahiwaru, they suggested that the Māori Priorities "need to be more fully developed and woven into the fabric of the Plan rather than listed as separate items." The work to create a Resource Recovery and Infrastructure Plan was suggested as a key vehicle in strengthening te ao Māori linked to waste management, noting the limited resources of NWŌ to engage in the many planning processes in Tāmaki.

Para Kore Marae strongly supported the direction of the plan but expected to see more at the top of the waste hierarchy, noting that the plan 'defers to Central Government' and that the language of the plan revolved too much around diversion from landfill rather than actions further up the hierarchy.

Other organisational views on the draft waste plan direction

The most common theme made by organisations on the direction of the plan were in support of zero waste, a circular economy, or recognition of the need to focus on actions high in the waste hierarchy (22 submissions). A submission from the Zero Waste Network supporting the plan was used as a pro forma submission or supported by a number of submitters including council partners delivering education and the RRN (Anamata – Envirokiwi Community Enterprise, Beautification Trust, Localised, Mahurangi Wastebusters, Kaipatiki Project, Waiuku Zero Waste, Waiheke Resources Trust); as well as broader environmental groups (e.g. Aotearoa Plastic Pollution Alliance; Tāmaki Makaurau Composters Network). This included support for the leadership shown by the council in zero waste, reflections on positive ways that leadership plays out, including putting mana whenua and mataawaka ‘front and centre’, and providing a working model through development of the RRN. They outlined their support and perspectives for all plan priorities and suggested several changes to the text of the plan to strengthen the focus higher up in the hierarchy amongst other things.

A common theme among organisations who did not support the plan’s direction focused instead on the need to make it easier for people to recycle, recommending that the focus be on sorting rubbish for reuse and/or a waste to energy solution (7 submissions). These organisations reflected common wording, primarily from residential sector organisations and Rubbish Direct.

Various specific suggestions to strengthen the plan’s direction included:

- Changing terminology to focus on waste reduction and recovery rather than diversion from landfill (WMNZ) and recognising embodied carbon impact of waste (WMNZ and Winstone Wallboards).
- Concern at lack of ambition in plan and targets, and suggesting better alignment with the Auckland Council’s Climate Plan 2020 (Carbon Neutral NZ Trust)
- Principles to guide expansion of council services and infrastructure including regard for market impact (Waste & Recycling Industry Forum).

Question 2 – Priorities for Action

From the online submissions form:

The draft waste plan includes 12 priorities for action (see section 3 of the Snapshot document). The following questions relate to specific priorities in the draft plan.

Question 2A – Fortnightly rubbish collections

From the online submissions form:

Food scraps make up 41 per cent of the rubbish in your rubbish bin. We have introduced a weekly food scraps collection service in mainland urban areas so you will have more space in your rubbish bin.

Cities such as Christchurch, Tauranga, Hamilton, and in other parts of the world, show that by using a weekly food scraps bin households can comfortably make do with a fortnightly rubbish collection.

We propose introducing a fortnightly rubbish collection for most Auckland households from 2026, with options for a larger bin for households that need it. Cost savings will be passed on to ratepayers.

We will also investigate options to divert other items from household rubbish e.g. nappies and medical waste.

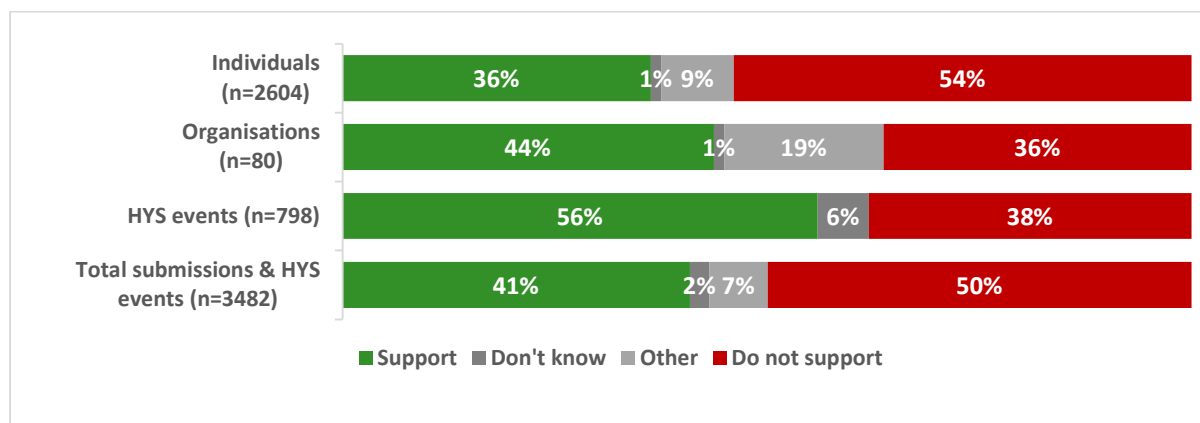
See section 4 of the Snapshot document.

What do you think of this priority area? Support, Don't know, Other, Do not support. Tell us why.

Question 2A – Summary of feedback: weekly vs fortnightly rubbish collections

An analysis of the overall level of submitters' support for a fortnightly rubbish collection is given in Figure 2 based on responses to the question on the feedback form or through responses received at Have Your Say events. Only those submissions that included a response to the question have been included in the analysis.

Figure 1 – Level of support – Question 2A – Fortnightly rubbish collections



Summary of submissions on the draft WMMP

The level of support from the responses at AK Have Your Say (HYS) events was higher than in the written submissions. This difference may be associated with a change in opinion based on a discussion with staff, who were able to highlight the purpose of the proposed reduction in frequency, including the waste reduction benefits of the proposal.

Breakdown by ethnicity and age

Demographic data from those who supplied this information showed differences in ethnicity and age on the level of support expressed, shown in Table 3 below. Europeans and those over 65 years old were more likely to support the proposal than others.

Table 3. Support by ethnicity

Individuals – ethnicity	TOTAL	Support	Do not support	Don't know	Other
European	1698	44%	52%	1%	4%
Māori	189	30%	66%	1%	5%
Pasifika	102	22%	74%	4%	5%
Asian	359	32%	65%	1%	4%

Table 4. Support by age

Individuals – age	TOTAL	Support	Do not support	Don't know	Other
Under 15	5	100%	0%	0%	0%
15-24	70	33%	56%	0%	11%
25-34	390	32%	58%	1%	10%
35-44	623	28%	60%	2%	12%
45-54	531	36%	58%	1%	6%
55-64	338	46%	49%	2%	7%
65-74	297	54%	40%	1%	8%
75+	124	62%	34%	1%	5%

Summary of key themes from those who support or with unspecified support for fortnightly rubbish:

- Around 30 per cent of comments mentioned the suitability of the proposed system for the needs of households; Of these, over 10 per cent noted concern about other households coping; larger bins were suggested.

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- The food scraps collection was referenced in approximately 20 per cent of these submissions: many of these noting the difference the food scraps bin had made in their own household's waste generation while some reasoned that reducing collection frequency would result in more households using the food scrap service.
- The costs of kerbside services were raised in a substantial number of comments; ranging widely from seeking reduced charges for a reduced frequency or recognising this would reduce costs.
- Some submitters recognised varied benefits of the proposal in reducing landfill and supporting the environment.

Summary of key themes from those who did not support fortnightly rubbish:

- Approximately 30 per cent are concerned about insufficient capacity of rubbish bins to last for two weeks.
 - Many of these said they use their food scraps and recycling bins effectively but still wouldn't be able to cope.
 - Some noted they had large households or were concerned for others with large households or specific waste needs related to nappies and medical waste.
- Approximately 30 per cent were concerned about bin hygiene and related issues of odour, maggots, rats and other pests.
- Another common theme was concern about illegal dumping and amenity such as from litter and overflowing bins.
- Various comments related to food scraps – noting use of the collection but that it would not reduce their rubbish enough; and that it is unfair for those who don't get a food scraps service to only have fortnightly collections.

Q2A – Detailed analysis

Q2A - Submissions supporting or with unspecified support for fortnightly rubbish collections

The proposal for fortnightly rubbish collections was supported by 50 per cent of submissions, when those that were of unspecified support are included. Many comments included more than one of the themes discussed below. A further 10 per cent chose 'Other' or 'Don't know' in response to the question. Based on the comments, many of these responses favoured fortnightly collections but their support was conditional to other changes to council's kerbside services, such as larger recycling bins.

Of submissions that included comments, 30 per cent mentioned the suitability of the proposed system for their households needs. Many of these comments described how their own household's recycling and use of the food scraps collection or composting had reduced their rubbish to the extent that a fortnightly collection would be adequate. Some of these comments noted that even a less frequent collection would be workable for their household. A few of the comments thought it unfair that there was no financial incentive for householders who used the council service infrequently.

Over 10 per cent of those who commented that the fortnightly collection would be adequate for their household also voiced concern for other households, such as large families or those with babies, which might not cope as well. Concerns for large households, and households that generated problem wastes such as nappies and medical waste, were also mentioned in other comments. The availability of larger rubbish bins was favourably noted in many of the comments relating to large households and other households that could not readily adapt to fortnightly collections.

The food scraps collection was mentioned in approximately 20 per cent of the comments from submissions that support fortnightly rubbish collections. Many of these comments referred to the difference the food scraps bin had made in their own household's waste generation while some reasoned that reducing collection frequency would result in more households using the food scrap service.

The costs of kerbside services were raised in a substantial number of comments. The comments ranged widely, from those seeking reduced rates for a reduced service frequency to those who were pleased the draft WMMP had signalled that there would be a reduction in collection costs and rates. A user-pays system was thought by some as being the most equitable payment system. A more flexible payment system was also sought, with some of those who compost at home, and others, believing they should not be charged for the food scraps bin or that the charge should be optional.

A range of concerns were raised in submissions from residents of multi-unit dwellings, commercial operations, and rural residents. These concerns focussed on the need for particular solutions for their situation, such as many apartment buildings not having space for food scraps bins and rural properties not needing a food scraps collection.

Other points raised, often in conjunction with other issues, by those in support, or of unspecified support, of the introduction of fortnightly rubbish collections included:

- an understanding that there is a link between reducing service frequency and the reduction of rubbish set out by householders
- a recognition of the environmental benefits that would result from a reduction in kerbside rubbish being disposed of to landfill. A wide range of benefits were posited
- the need for education and behaviour change programmes to assist households in making the change
- the need for more disposal options for difficult-to-recycle materials such as soft plastic
- concern that any savings resulting from reduced collection costs would not be returned to the ratepayers
- difficulties that would be encountered by the elderly and others with moving heavier rubbish bins to the kerbside
- the need for a reduction in packaging and for consumers to make more considered purchasing choices
- the potential for an increase in littering and illegal dumping
- hygiene issues relating to rubbish bins being left for longer before emptying
- the successful implementation, both in New Zealand and worldwide, of fortnightly rubbish collections.

Q2A - Submissions not supporting fortnightly rubbish collections

The proposal for fortnightly rubbish collections was not supported by 54 per cent of submissions. Many of these comments included several of the themes discussed below.

The most common theme in comments not supporting fortnightly collections was that there would be insufficient capacity in most households' rubbish bins to last for two weeks. Insufficient capacity was mentioned in approximately 30 per cent of comments. Many of these comments asserted that they were using their food scraps and recycling bins as effectively as possible but still wouldn't be able to cope with fortnightly collections. Some, but not all, of these comments remarked on the large number of members in their household. Other comments about insufficient capacity were more general in nature, identifying larger households and those with particular wastes, such as nappies and medical waste, as potentially having difficulty coping with fortnightly collections.

The next most common theme, raised in 30 per cent of comments not supporting fortnightly rubbish collections, related to bin hygiene. Many comments focussed on a number of hygiene issues. Frequently mentioned in connection with hygiene were: more smell from rubbish kept for two weeks; increased numbers of rats, insects, maggots, ants, and other pests; risks of disease, particularly from nappies and medical waste storage; and pet wastes, such as faeces and cat litter.

A similar number of comments raised issues relating to illegal dumping and amenity values. A large number of these comments foresaw a significant increase in illegal dumping and a decrease in street amenity values from litter and overflowing bins. More illegal dumping, both on public and private property, was seen by many as being an inevitable consequence of householders needing to dispose of rubbish once their rubbish bin was full. Some comments compared the potential increase in litter from fortnightly rubbish collections to their own experience of there being more litter in parks subsequent to the recent removal of some public place litter bins.

A variety of comments were made about the food scraps collection in submissions not supporting fortnightly collections. Many of these were recounting personal experience of using the food scraps system regularly but still not being able to reduce their rubbish enough for a fortnightly collection. Concern was raised by some residents that don't receive the food scraps service that it was unfair for their rubbish collection to be changed to fortnightly. Various problems with the food scraps service were mentioned, such as bins not being emptied regularly, bins being broken, empty bins blowing down the street, and the pink compostable bags being expensive and not fit for purpose.

Other points raised, often in conjunction with other issues, by those not supporting the proposed fortnightly rubbish collections included:

- that weekly rubbish collections are a core council service
- a city-wide user-pays system, such as bin tags, would more effectively reduce rubbish than changing to fortnightly collections
- not believing that there would be any link between reducing service frequency and a reduction of rubbish set out by householders
- concern that the introduction of new kerbside recycling standards had increased the volume of material that must be disposed of in rubbish bins

- the problem of unusual volumes of rubbish being generated at special occasions, such as parties, when hosting household guests, and family dinners.
- the removal of public place litter bins would further increase the amount of rubbish being disposed of in kerbside rubbish bins
- even though larger rubbish bins would be made available, many landlords would not pay for these for their tenants
- concern that any savings resulting from reduced collection costs would not be returned to the ratepayers
- difficulties that would be encountered by the elderly and others with moving heavier rubbish bins to the kerbside
- likely difficulties in remembering to set rubbish bins out fortnightly.

Q2A - Mana whenua and mataawaka organisational views on the fortnightly rubbish proposal

Te Ahiwaru and Ngāti Whātua Ōrākei made no comments on the fortnightly rubbish proposal.

Para Kore Marae supported the proposal, noting that it will incentivise waste reduction. They also support offering flexible bin sizes for larger households and passing on cost savings to ratepayers; noting that low waste or no waste households in particular should be rewarded.

Q2A – Other organisational views on the fortnightly rubbish proposal

While more of the 78 submissions from organisations were in support of fortnightly collections (44 per cent in support compared to 36 per cent not in support), a relatively high percentage (19 per cent) responded 'Other'. These submissions included submitters concerned that the needs of commercial areas and multi-unit dwellings had not been adequately addressed in the draft WMMP.

The most common theme raised by 15 organisations (including the Auckland City Residents Group and various body corporates) was the impact of fortnightly collections on apartment dwellers / multi-unit developments with some noting they have common rubbish areas or restricted space. Five submissions similarly questioned the provision of services for commercial areas including food scraps collections; or noted concern about impacts on small businesses which depend on council collections.

Twelve organisations raised concerns linked to litter and illegal dumping. These included community sector organisations focused on keeping areas tidy, business associations and residents and ratepayer groups. A similar number of concerns were also raised around issues with bin hygiene such as odour or attracting rodents.

In contrast, 12 organisations, mostly operating in the resource recovery and education sector, recognised that a fortnightly collection would reduce waste and have wider environmental benefits. Of these, many commented on the need to support larger bin sizes for those in need; and seven organisations also suggested incentives for low waste producers.

Other individual perspectives included:

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- concern about groups with a lot of medical waste which they have little control over (Disability Connect)
- Continued weekly pickups for kindergartens (Ngā Tamariki Puāwai o Tāmaki / Auckland Kindergarten Association)
- concerns around the potential for larger bins on footpath user from an accessibility perspective and for line of sight of small children and drivers alike (The Safety Collective)
- support for fortnightly rubbish for residential areas, noting those who opt in to food scraps should pay; but that rural residents can use scraps for stock or can compost green waste (Federated Farmers)
- queries linked to the data around waste reduction (WMNZ and the Waste & Recycling Industry Forum) and concern related to increased bin contamination (Waste & Recycling Industry Forum).

Question 2B – Construction and demolition waste

From the online submissions form:

Waste from construction and demolition (C&D) activity makes up almost 40 per cent of commercial waste in landfills. Reducing this waste and making better use of materials from C&D is a priority in the draft WMMP over the next six years. This will help us reduce Auckland's total waste to landfill by 30 per cent by 2030.

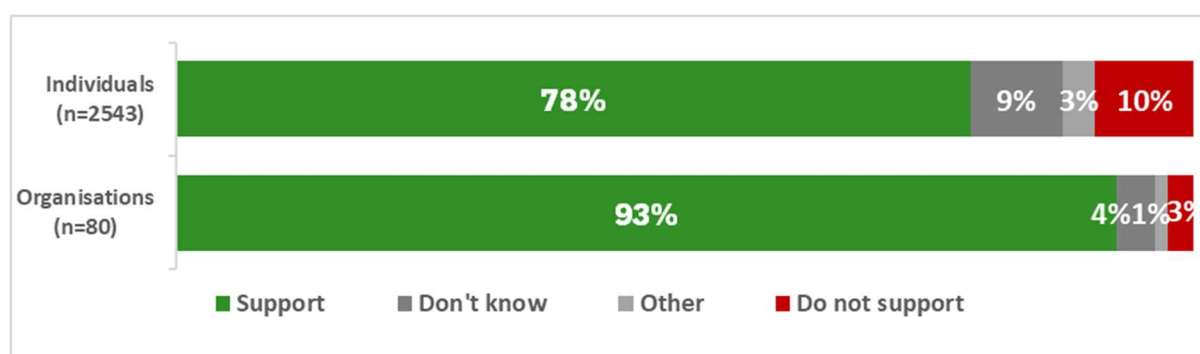
See section 4 of the Snapshot document.

What do you think of this priority area? Support, Don't know, Other, Do not support. Tell us why.

Question 2B – Summary of feedback on C&D waste

An analysis of the overall level of submitters' agreement with the question is given in Figure 2. Only those submissions that answered the question on support have been included in the analysis. This topic was not consistently canvassed at AK HaveYourSay events.

Figure 2 – Level of support – Question 2B – C&D waste



Summary of key themes

- general agreement that C&D waste is concerning
- the need for the construction sector to take responsibility for this waste
- recognition of roles of the council and/or central government in reducing C&D waste. Only a few of those that did not support the question considered council should not intervene and leave sole responsibility to the construction sector to reduce C&D waste.
- highlighting a range of interventions, including financial incentives, regulatory controls, establishment of facilities, training, behaviour change, the use of sustainable building materials, and effective construction and deconstruction methods to reduce waste
- assumed increases to construction costs and/or council rates were the most frequent comment made by those that did not support this priority.

- other common concerns related to proposed actions not having an impact due to increased construction activity, and other environmental risks which may result from ill-conceived actions (i.e. illegal dumping from construction activities and/or burial of wastes on site).

Q2B – Detailed analysis

Q2B – Submissions supporting or with unspecified support for prioritising C&D waste reduction

Approximately 37 per cent of the 879 comments made on this topic did not provide a specific reason for the submitter's support but agreed that C&D waste was an issue of concern. The concern was often based on the submitter's personal experience, such as their own observations of C&D sites or from having worked in the industry.

The largest specific issue raised by submitters was the allocation of responsibility for reducing C&D waste. Approximately 12 per cent of submitters placed this responsibility primarily on the construction sector. Many of the comments identified the construction sector as needing to take more responsibility through the improvement of design, products, purchasing, construction methods, and waste management practices.

However, approximately 12 per cent of comments considered there is a role for council and central government in reducing C&D waste. These comments brought up the need for regulations, increased costs for disposal, and higher standards, such as mandatory site waste management plans, to be set at different levels of government. A significant number of comments recognised that the C&D waste problem could best be addressed through cooperation between the industry and government.

The next largest group of comments focussed on a need for more facilities and systems to allow for an increase in the quantity of building materials being recycled and/or reused. Some of these comments described industry-wide systems being introduced within the construction sector while a substantial proportion mentioned simpler solutions, such as separate skip bins for different materials and making waste building materials available for DIY projects. Many of these comments highlighted the large quantities of reusable building materials that they had observed being disposed of to landfill.

Other issues raised by those in support, or of unspecified support, of the proposed actions to reduce C&D waste included:

- personal observations that waste materials at building sites were rarely separated to facilitate recovery
- a need for better training, support, educational tools, and behaviour change initiatives
- the important role of financial incentives, particularly through increased disposal costs
- while in support of the actions to reduce C&D waste, some comments expressed concern about the possible financial effects, particularly that building costs would increase
- some submitters, while in support of the actions, wondered whether the actions would exacerbate existing issues with illegal dumping, litter, and the burying, on site, of building waste
- specific issues such as the disposal of building wrap and polystyrene, the need for more sustainable building materials, the waste reduction advantages of higher-density building, soil disposal, and better deconstruction practices

- the environmental benefits that would result for reduced C&D waste.

Q2B – Submissions not supporting prioritising C&D waste reduction

Of those not supporting council's proposed actions to reduce C&D waste, 148 included comments.

Issues relating to the cost of reducing C&D waste were those most frequently cited by those not in support of the proposed actions, with approximately one-third of comments raising the issue. Increased costs were mentioned primarily with regards to a perceived increase in the cost of construction. This was frequently brought up in the context of rising construction costs and Auckland's housing shortage. Other submitters were concerned that the proposed actions would result in an increase in council rates.

The second most frequently cited reason for not supporting the proposed actions was that they were impractical or ill-conceived. Reducing C&D waste was seen by several to be an impossibility in general terms, specifically, during a time when construction activity was increasing. That the proposed actions would result in environmental benefits was disputed. Several mentioned a likely increase in illegal dumping and the burial of waste on construction sites.

The reduction of C&D waste was seen by a few submitters as being the sole responsibility of the construction sector and that council should not intervene.

Of those that did not support the proposed actions to reduce waste, a minority were in favour of other council or central government interventions. Other government interventions that were mentioned included:

- waste management plans for building sites
- more budget for regulatory compliance measures
- increased charges for disposal to incentivise waste reduction
- mandated beneficial use of clean hard fill
- mandated recycling of waste materials
- improved infrastructure for recovering C&D materials.

Q2B – Mana whenua and mataawaka organisational views on the C&D waste priority

Ngāti Whātua Ōrākei expressed concern about the large amount of C&D waste going to landfill. They suggest a focus on writing a resource recovery and infrastructure plan is needed to address this and commercial waste (refer to Q1 above). They also seek further analysis on composition of waste by activity source.

Te Ahiwaru made no comments on construction and demolition waste.

Para Kore Marae expressed support for this priority but thought the plan vague in demonstrating how exactly the council will action this. They support a focus on prevention and tighter rules during consenting to ensure sustainable design and materials.

Q2B – Other organisational views on the C&D waste priority

Summary of submissions on the draft WMMP

There was a high level of support (93 per cent) from organisations to prioritise C&D waste. This included many organisations working primarily in the construction sector such as Winstone Wallboards, Auckland Registered Master Builders association, NZ Green Building Council, and NZ Chinese Building Industry Association (NZCBIA), together with resource recovery organisations including the Zero Waste Network and council RRN partners.

Actions linked to central government or council regulations and incentives were highlighted by 18 organisations, with the most common suggestion (16 submissions) referring to site waste management plans. Of these, 12 specifically mentioned these should be mandatory, or supported the Zero Waste Network's direction on this. Other suggestions included increasing the waste levy, supporting green building rating systems, or banning products from landfill where there are accessible recovery options.

Education or behaviour change initiatives were suggested by nine organisations, including opportunities to profile best practice and greenhouse gas savings from waste reduction. Supporting or increasing facilities that divert C&D waste was also referenced by nine organisations – with a special focus by some on the council's resource recovery network.

There were also a few suggestions for the council to focus on linking various parts of the sector together to maximise resource recovery; and suggestions to relocate homes for resale, or to deconstruct rather than demolish buildings.

Question 2C – Priority waste materials

From the online submissions form:

We propose to focus on five priority waste materials:

- organics (including food scraps, green waste, timber and cardboard/paper)
- plastics
- packaging
- textiles
- biosolids (the organic material resulting from sewage and wastewater treatment).

These are the materials that make up significant volumes in landfills, release greenhouse gases, or are problematic when they break down – such as microplastics in the environment.

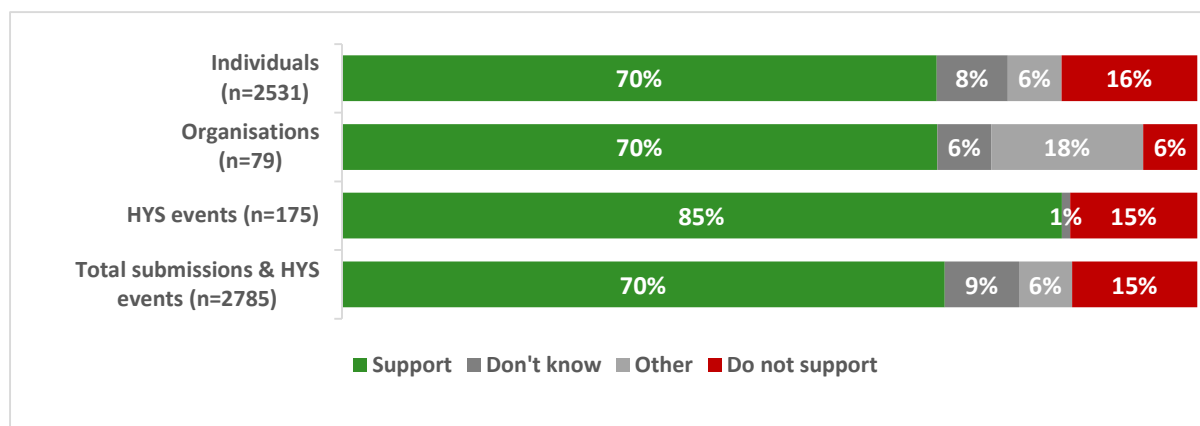
See section 4 of the Snapshot document.

What do you think of these priority areas? Support, Don't know, Other, Do not support. Tell us why.

Question 2C – Summary of feedback on priority waste materials

An analysis of the overall level of submitters' support for a focus on priority waste materials is given in Figure 3. Only those submissions that responded to the question on support have been included in the analysis. This topic was not consistently canvassed at HaveYourSay events.

Figure 3 – Level of support – Question 2C – Priority waste materials



Summary of key themes

- Plastics, textiles, green waste and packaging were the materials mentioned most often in comments from both those in support and those not in support of this priority.
- Issues raised by those supporting the priority related to the need to involve manufacturers/distributors, regulatory interventions (bans, tariffs, regulations), financial incentives, and educational and behaviour change initiatives to address the waste streams. Similar issues were raised by those not in support of the priority.

- Both positive and negative comments regarding kerbside collections (recycling and food scraps) were received, and green waste was also mentioned as a waste material some consider is difficult to dispose of.
- Other waste materials referred to by submitters as also needing attention were: e-waste, hazardous materials, construction waste, medical waste, nappies and other sanitary products.

Q2C - Detailed analysis

Question 2C – Submissions supporting or with unspecified support for the focus on priority waste materials

Approximately 25 per cent of comments identified at least one of the priority waste materials as being of particular concern. Plastics, textiles, green waste, and packaging were the most frequently mentioned. Many of these comments suggested specific initiatives that would reduce the quantity of the material being landfilled.

Included in 13 per cent of comments was the perceived need for solutions that would involve manufacturers and distributors of the priority waste materials. While many of these comments were general in nature, some were related to specific sectors, mentioning, for example, the packaging industry or supermarkets.

Approximately 8 per cent of comments included a reference to the environmental benefits that would result from reducing the landfill disposal of the priority products. A similar number of comments suggested a range of improvement that could be made to the recovery systems for a priority product. Green waste was mentioned many times as a waste material that was currently difficult to dispose of.

A number of comments were concerned with waste materials that were not included in the priority waste materials. Those most frequently mentioned were e-waste, hazardous materials, construction waste, and nappies and other sanitary products.

Approximately 8 per cent of comments referenced the food scraps collection. These comments were split relatively evenly between positive and negative remarks. A similar number of comments made negative remarks about the new kerbside recycling standards.

Other issues that were raised in submissions that supported council's focus on priority waste materials were:

- the need for government interventions, such as regulations, tariffs, and product bans
- various financial incentives, such as container return schemes, that would reduce waste
- the importance of education, behaviour change initiatives, and publicity campaigns.

Question 2C – Submissions not supporting focus on priority waste materials

Of those submissions that did not support the focus on priority waste materials, the largest number of comments (approximately 20 per cent) did not express a specific reason for not supporting the focus on priority waste materials. Most were very brief. Several of these comments were derogatory in nature and others were not relevant to the question.

The second largest number of comments, approximately 15 per cent, included references to the food scraps collection and were uniformly negative. Most of these comments detailed perceived shortcomings in the current system and were only marginally relevant to the question. Some, however, suggested methods of diverting food scraps that would have more beneficial effects, such as home composting.

Approximately 13 per cent of comments from submissions not supporting the focus on priority waste materials included concerns about cost and rates increases. Few of these comments actually referenced the issue of priority waste materials.

A further 8 per cent of comments mentioned one of the priority waste materials. Plastics, textiles, green waste, and packaging were the most frequently mentioned. Many of these comments suggested specific initiatives that would reduce the quantity of the material being landfilled.

Of those that mentioned plastics, there was agreement that it should be a priority waste material. A number of comments recommended that organics should not be a priority material but should be self-managed.

A small number of comments suggested that other waste materials were of greater priority. These included C&D waste, hazardous goods, e-waste, nappies, and medical waste.

Other themes from submissions that did not support priority waste materials included:

- the importance of education and behaviour change initiatives
- the negative effects of the new kerbside recycling standards and the proposal to reduce the frequency of kerbside rubbish collections
- the need for central government to provide support for the waste reduction measures
- specific problems with existing kerbside services for businesses and multi-unit dwellings

Q2C – Mana whenua and mataawaka organisational views on the priority waste materials

Ngāti Whātua Ōrākei noted that packaging is not defined and that data not quantified in the plan. They suggest this be addressed and expressed concern that the actions don't reflect the need for adequate processing infrastructure to tackle the priority waste streams.

Te Ahiwaru made no comments specific to this topic.

Pare Kore Marae reflected strong support for weekly food scraps collections to support whānau to build soil sovereignty and food security. They listed ideas to support reducing organic waste to landfill linked to composting, worm farms, and community initiatives.

They stated that manufacturers and businesses should be heavily involved in shifting their behaviours and business models, and suggested changes to the language used in the draft Waste Plan to better reflect a focus on source reduction.

Q2C – Other organisational views on the priority waste materials

Summary of submissions on the draft WMMP

Organisations showed a high level of support overall for the proposed priority waste materials. The most common theme reflected their concerns with some or all the priority waste materials (16 submissions). The material most commonly referenced was plastic waste; and there were a variety of suggestions for actions to address the priorities. In regard to organic waste, four organisations including the Zero Waste Network and Tāmaki Makaurau Composters Network wrote about the need for local scale and community led solutions for organic waste.

Nine organisations also referenced other materials that should be priorities, with the most consensus being around batteries or e-waste (four submissions). This included WMNZ and the NZ Association of Metal Recyclers who linked this to the risk of fires from batteries.

The need for manufacturers or producers to take greater responsibilities for waste, was referenced by eight organisations, some reflecting the amount of waste going to landfill from the sector, others noting how manufacturers influence product waste.

Six organisations including various apartment/body corporation organisations and Rubbish Direct, suggested the focus on reduction was incorrect. They suggest we support people buying fast fashion, and focus on providing infrastructure to develop ways to reuse discarded clothing.

A number of specific suggestions were made including:

- suggested changes to wording to recognise local composting initiatives and prioritise these over expanding anaerobic digestion (Aotearoa Composters Network, Waiheke Resources Trust, Blue Borage Ltd)
- actions to address plastic pollution (Aotearoa Plastic Pollution Alliance)
- banning food waste to landfill and require mandatory labelling on packaging for recyclability (Green Business HQ)
- concern that the plan generally does not sufficiently emphasise the issue of biosolids noting the urgency of work needed to address this significant waste stream which is a major greenhouse gas emitter (Carbon Neutral NZ Trust)
- seeking council support/promotion for using organics in landfill (WMNZ).

Question 2D – Product stewardship

From the online submissions form:

Advocating to central government for a beverage container return scheme (CRS) and other mandatory product stewardship schemes is a key priority action within the draft WMMP. The CRS will ensure containers are returned for re-use and recycling instead of littering roadsides and waterways.

This and other product stewardship schemes will shift the cost of waste disposal from ratepayers to producers, manufacturers and consumers, and drive higher rates of reuse and resource recovery.

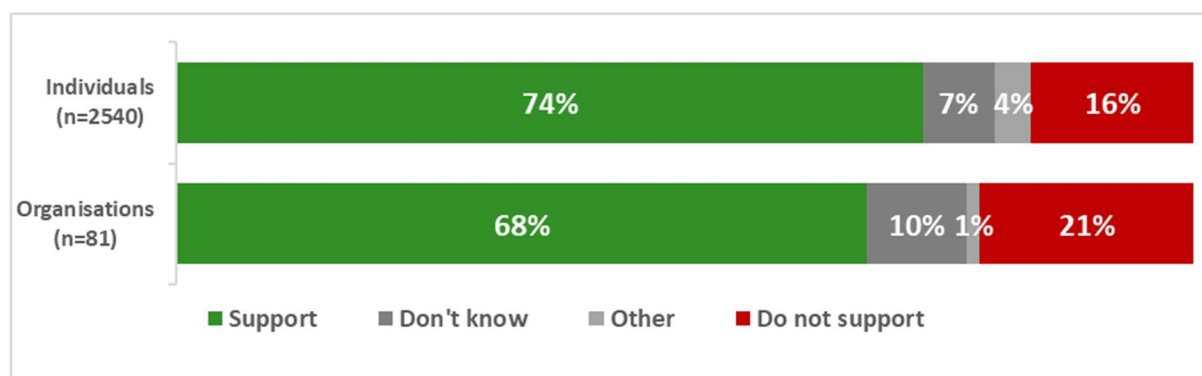
See section 5 of the Snapshot document.

What do you think of this priority area? Support, Don't know, Other, Do not support. Tell us why.

Question 2D – Summary of feedback

An analysis of the overall level of submitters' support for prioritising product stewardship is given in Figure 4. Only those submissions that responded to the question have been included in the analysis.

Figure 4 – Level of support – Question 2D – Product stewardship



Summary of key themes

- both those in favour of the priority and those opposed often referred to a beverage container return scheme as an example of product stewardship. Those in favour noting examples of the successes of overseas container return schemes and various benefits, and those not, highlighting cost implications to consumers and manufacturers, and the need for alternative methods (e.g. recycling facilities, kerbside collections, bylaws and behaviour change).
- those in support of product stewardship commented on benefits such as shifting responsibility to manufacturers and other commercial entities across a product's life-cycle, reducing waste and litter, and the potential for earning income for organisations and individuals (through beverage container deposits).

- issues raised related to the need for product stewardship to create financial incentives for consumers to recover materials, central government regulations, operational challenges, and prioritising reduction and reuse of materials over recycling.
- some comments were based on mistaken assumptions about how a scheme may operate, such as beverage containers not being accepted within council's kerbside recycling service if a CRS was implemented.

Q2D - Detailed analysis

Q 2D – Submissions supporting or with unspecified support for prioritising product stewardship

Of the 864 comments in support of product stewardship or of unspecified support, approximately 24 per cent noted the success of product stewardship systems elsewhere, particularly container return schemes. The Australian container return scheme was cited most frequently but schemes in Europe and several other countries were also mentioned. Many submitters described their positive experiences with the now-defunct bottle return scheme in New Zealand and the bottle drives that raised funds for charities.

A further 20 per cent of comments did not provide a specific rationale for the chosen level of support. Many were markedly more enthusiastic in their support than for any of the other questions. Most of the enthusiastic comments were directed specifically at a container return scheme.

A similar 19 per cent of comments expressed support for the responsibility of manufacturers and other commercial entities being extended to include more of a product's life-cycle. While some of these comments referred specifically to container return schemes and other packaging concerns, many related to the wider economy in general. Comments referring to extended producer responsibility and similar concepts tended to be lengthier and more analytic than responses to other questions.

Approximately 9 per cent of comments highlighted the benefits that would result from product stewardship, particularly container return schemes. A reduction in litter, improved waste management behaviour by individuals and businesses, and the income-earning potential for organisations and individuals were mentioned.

Other issues raised in comments that supported the prioritisation of product stewardship included:

- the importance of financial incentives to consumers for product stewardship schemes to be successful
- the need to advocate for central government support for product stewardship
- concern that costs for product stewardship would ultimately be borne by the consumer
- difficulties with implementing container return schemes at the operational level
- specific products that should be included in product stewardship schemes, including textiles, coffee cups, glass jars, mattresses, large packaging, and various types of plastic
- the importance of prioritising reduction and reuse of materials over recycling.

Question 2D – Submissions not supporting prioritising product stewardship

The proposal to prioritise product stewardship was not supported by 16 per cent of submissions. Of the 421 submissions that did not support this priority, 185 included comments. These comments tended to be brief and address a single issue.

The largest proportion of comments (35 per cent) that did not support product stewardship being a priority raised concerns about the cost implications. Nearly all of the comments focussed on container return schemes and the submitters were clearly of the opinion that the costs of such a scheme would be borne by consumers and not the manufacturers. Most of these comments showed a lack of understanding of how the container return scheme proposed by central government would function.

Approximately 14 per cent of comments did not support product stewardship because the submitters did not believe a scheme would result in any useful benefits. These comments were almost entirely concerned with a container deposit scheme. Many of the comments were based on the mistaken assumption that the scheme would result in beverage containers not being accepted by council's kerbside recycling service.

A similar number of comments did not want council to have any involvement with product stewardship. Again, these comments nearly all pertained to a container return scheme. Many of these comments assumed that Auckland Council was proposing that it establish its own container return scheme, rather than the advocacy role proposed in the draft WMMP.

Other themes from comments did not support product stewardship included

- a container return scheme should be council's responsibility and would not need to involve central government.
- a container return scheme would result in more littering.
- improved recycling facilities would be as effective as a container return scheme in improving recycling rates.
- enforcement of bylaws, education, and behaviour change programmes would produce better results than product stewardship schemes.

Q2D – Mana whenua and mataawaka organisational views on product stewardship

Te Ahiwaru and Ngāti Whātua Ōrākei made no comments on this topic.

Para Kore Marae strongly support mandatory product stewardship for some products, especially drink containers; recognising that schemes shift waste costs from ratepayers to consumers. They see a need for monitoring to keep producers accountable for these schemes.

Q2D – Other organisational views on product stewardship

Most organisations (68 per cent) supported this priority, with 21 per cent unsupportive and the remainder undecided.

Summary of submissions on the draft WMMP

Thirteen organisations recognised that businesses including producers and manufacturers, have an important role in this space, and 12 organisations mostly in the community sector (Zero Waste Network, Resource Recovery Network partners, Aotearoa Composters Network, Be a Tidy Kiwi, Sustainable Coastlines) also reflected on the fact that a container return scheme has one or more of the following benefits:

- the proposal was already well supported in government consultation
- it creates incentives to return products for recovery
- will reduce litter
- supports facilities for takeback that can be used for reuse and refill models

A number of organisations commented that such schemes have worked well in the past or work well overseas (11 submissions).

Ten of these organisations stressed that product stewardship involves financially sustainable models which appropriately moves the financial burden away from ratepayers and towards consumers: *“We can’t run the circular economy on grants and subsidies”* – Waiuku Zero Waste

Eight organisations reflected on the role of central government generally, with a number of community organisations concerned that product stewardship scheme design:

- doesn’t rely on recycling, but focuses on top of waste hierarchy actions (e.g. reuse and refill)
- involves community resource recovery sector

The most common theme in those organisations who did not support this priority was a concern about costs being passed to businesses or to users, rather than producers (11 submissions). Seven organisations (including Rubbish Direct and various apartment/body corporation organisations) listed a concern that *“this is another example of not wanting to put the right infrastructure in place and trying to find a way to get the consumer to fix the problem”*.

Other individual perspectives related to this priority included:

- Referring to a CRS as a ‘deposit return scheme for drink containers’ to make it clearer to people what is meant (The Zero Waste Network; fully supported by Tāmaki Makaurau Composters Network).
- That the council advocate for an all-of-packaging scheme, rather than supporting the Plastic Packaging Product Stewardship Scheme (PPPS) and CRS (The Packaging Forum).
- Concern that a CRS will not deal with glass in food product packaging and will confuse users when sorting waste (Glass Packaging Forum).
- Small businesses should be involved regarding implementation (Ellerslie Business Association).
- The CRS should include liquid-paperboard (Tetra Pak Oceania).
- Product stewardship is important from a climate justice (polluter pays) perspective (Aotearoa Plastic Pollution Alliance).

Question 2E – Litter and illegal dumping

From the online submissions form:

Addressing litter and illegal dumping to protect public health and the environment includes advocating to central government for better legal tools (e.g. instant fines) to deal with litter and collaborating with communities on local solutions for hot spot areas.

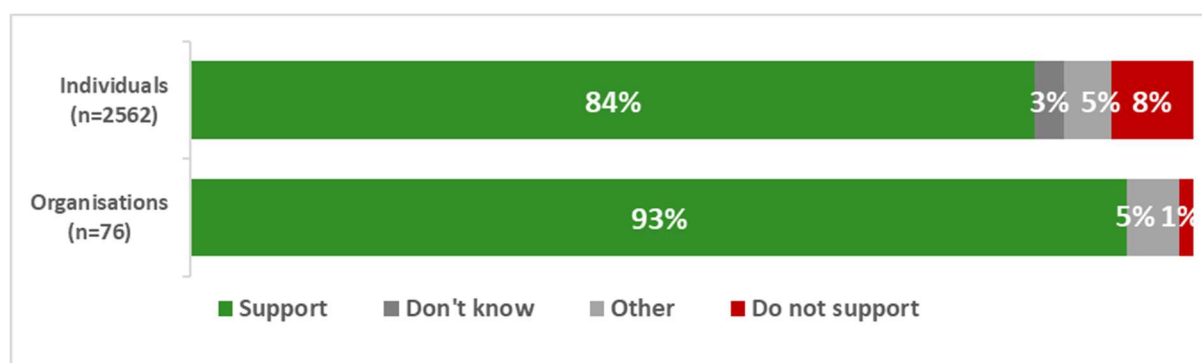
See section 6 of the Snapshot document.

What do you think of this priority area? Support, Don't know, Other, Do not support. Tell us why.

Question 2E – Summary of feedback

An analysis of the overall level of submitters' support for prioritising litter and illegal dumping is given in Figure 5. Only those submissions that responded to the question on support have been included in the analysis. A high level of support was received for this priority.

Figure 5 – Level of support – Question 2E – Litter and illegal dumping



Summary of key themes

- strong criticism expressed about individuals who litter and/or illegal dump rubbish.
- support for enforcement measures, such as fines and surveillance systems, although some noting difficulties in identifying and prosecuting offenders and enforcing penalties.
- support for council to take roles to support public education and behaviour change programmes, and to provide accessible waste facilities and services as well as litter/clean-up services.
- various reasons were provided for undesirable behaviours, such as lack of equitable and unaffordable options to dispose of waste, inadequacies with the current kerbside inorganic collection service, and difficulties to transport rubbish to facilities.
- solutions suggested by submitters included, free disposal, more disposal facilities and community recycling centres, and improved or alternative collection services (e.g. for specific items such as for mattresses).
- concerns were expressed about potential increases in litter/illegal dumping if shifting to fortnightly rubbish collections for households, or due to the removal of public litter bins.

Q2E - Detailed analysis

Q2E – Submissions supporting or with unspecified support for prioritising litter and illegal dumping

Of these submissions, 938 included comments. Some comments specifically mentioned either 'litter' or 'illegal dumping' but others did not differentiate between them. Many comments included more than one of the themes discussed below.

Approximately 20 per cent of comments in support of prioritising litter and illegal dumping or of unspecified support did not provide a specific rationale. A substantial number of these comments expressed strong feelings about littering and/or illegal dumping and spoke in critical terms of the individuals who caused the problems. Illegal dumping was mentioned more frequently than litter and specific 'hot spots' for illegal dumping were referred to by many submitters.

Approximately 29 per cent of the 938 comments were in favour of fines or other enforcement measures as a means to reduce the problem. Many of the comments forcibly expressed their support for penalising offenders. The potential usefulness of cameras for catching those responsible for illegal dumping was often mentioned.

Approximately 12 per cent of comments addressed the causes of litter and illegal dumping and/or offered solutions. The most frequently cited causes for illegal dumping were the high cost of landfill disposal, the lack of disposal options, and the difficulties many residents had in transporting rubbish to a transfer station. The effect of these issues on lower income households was often mentioned, particularly for those with limited transportation options. Specific situations that could result in problems with disposing of waste were mentioned, such as moving homes or evictions.

Solutions offered for these problems included free disposal, more disposal facilities and community recycling centres, bespoke collections (such as for mattresses), and improvements to the existing kerbside inorganic collection. Problems expressed regarding the current inorganic collection system included residents not knowing when the collection would occur, the restricted volume of materials that could be set out, and difficulties associated with not being able to put waste materials on the verge. A return to the previous system of kerbside inorganic collections was requested by many submitters.

Of the submissions that supported the prioritisation of litter and illegal dumping, approximately 12 per cent of comments referred to council's removal of public place litter bins and predicted increased littering would be the result. Many of these comments were derogatory towards council. Similarly, the proposed change to fortnightly rubbish collections were mentioned, in negative terms, in about 6 per cent of comments, which predicted the change would result in more illegal dumping.

A similar number of comments, while agreeing with penalising offenders, focussed on the difficulties of implementing any enforcement measures. The difficulty most often cited was identifying those responsible, particularly when measures were being taken by the offender to avoid being observed.

Other issues raised by submitters supporting the prioritisation of litter and illegal dumping included:

- the need to support efforts to reduce litter and illegal dumping efforts with publicity, education, and behaviour change programmes

- the need for improved street cleaning services and more frequent removal of litter from streets and public place litter bins.

Q2E – Submissions not supporting prioritising litter and illegal dumping

The proposal to prioritise litter and illegal dumping was not supported by 211 submissions, of which 167 included comments. Many comments included one or more of the themes described below.

Approximately one-third of comments identified causes of littering and, in particular, illegal dumping, as being related to the lack of affordable options for the disposal of waste. The most frequently cited causes for illegal dumping were the high cost of landfill disposal, the lack of disposal options, and the difficulties many residents had in transporting rubbish to a transfer station. The effect of these issues on lower income households was often mentioned. A high proportion of these comments referred to the inadequacies of the current kerbside inorganic collection.

Nearly one-quarter of comments from submissions that did not support the proposal referred to the proposed change to fortnightly rubbish collections. Most of these asserted that the reduction in rubbish collection frequency would result in an increase in illegal dumping in both public and private spaces.

A similar number of comments referred to the council's recent removal of many public place litter bins. Most assumed this would result in an increase of littering in public places.

Other issues raised by submitters not supporting the prioritisation of litter and illegal dumping included:

- the need to support efforts to reduce litter and illegal dumping efforts with publicity, education, and behaviour change programmes
- fines for littering and illegal dumping were mentioned by both those in favour and those against. Some of those against fines pointed out that those residents who could not afford to pay for the disposal of waste would not be able to afford fines for illegal dumping.

Q2E – Mana whenua and mataawaka organisational views on litter and illegal dumping

Te Ahiwaru and Ngāti Whātua Ōrākei made no comments on this topic.

Para Kore Marae noted concern around punishing people with fines as this often impacts low-income families. Instead, they encourage community training and education; and recognised the convenient and cost-effective collection for problematic items like mattresses and tyres would be valuable.

Q2E – Other organisational views on litter and illegal dumping

Summary of submissions on the draft WMMP

Organisations provided suggestions for initiatives to reduce litter or illegal dumping. The most common suggestions were use of fines (11 organisations), or for education, behaviour change initiatives, or campaigns (10 organisations).

Other popular suggestions were lowering waste disposal costs at landfills or transfer stations (seven submissions), or focusing on local facilities to support recovery or disposal of inorganic items (seven submissions). Three community organisations were concerned for struggling households, noting they often buy cheap or secondhand items that quickly become waste. The Zero Waste Network, and other community partners supporting that submission noted the need to evolve the inorganics service with the resource recovery network to support households who struggle to access or fund waste services.

The need for a container return scheme, product stewardship schemes or other collection methods for problematic items was recognized by six organisations. A CRS was linked to reduced litter, and collection schemes for large items (mattresses, tyres, e-waste) was supported to reduce dumping.

Community organisations also sought ongoing support or resourcing for groups who work to reduce or deal with litter and dumping such as clean-ups, education, litter surveys and citizen science (five submissions).

Other suggestions from organisations impacted by litter and dumping included:

- concern about removal of rubbish bins contributing to litter (Ellerslie and Glen Innes Business Associations)
- support for better regulatory tools and partnering with non-governmental organisations (Be a Tidy Kiwi)
- adding a target for reduced litter and indicator of waste ending up in the environment (Sustainable Coastlines)
- support to create an illegal dumping strategy, smart technology, more resourcing, and name and shame case studies of dumping prosecutions – (Wilkinson Environmental)

Question 3 – Draft Hauraki Gulf Islands Plan

From the online submissions form:

The Hauraki Gulf Islands (HGI) Waste Plan has been developed as an appendix to the draft WMMP in recognition of the unique nature of waste management and minimisation on the islands.

See section 4 of the Snapshot document, and the HGI Waste Plan 2024-2030.

The plan includes goals and actions for waste management and minimisation on these islands.

Question 3A – Aotea/Great Barrier

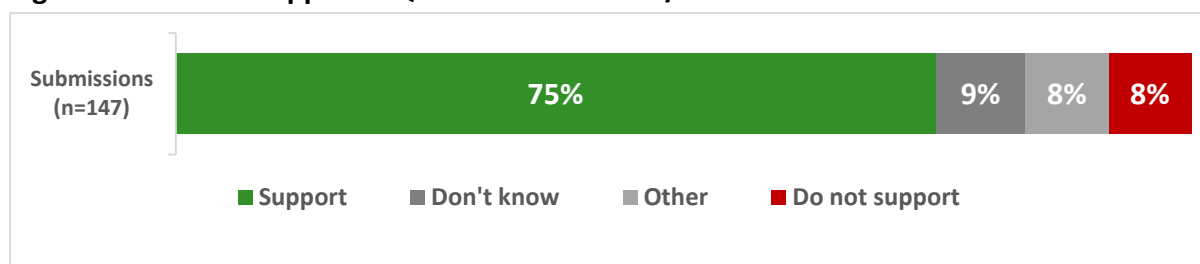
From the online submissions form:

What is your opinion on the goals and actions for addressing waste management and minimisation on Aotea/Great Barrier?

Q 3A – Level of support for goals and actions in HGI Waste Plan – Aotea/Great Barrier

An analysis of the level of support for the goals and actions in the HGI Waste Plan from submissions that commented on Aotea/Great Barrier is given in Figure 6. Only those submissions that responded to this question have been included in the analysis. Submissions from individuals and organisations have been combined in this figure as the number of organisational responses is low.

Figure 6 – Level of support – Question 3A – Aotea/Great Barrier



In addition to the responses to the written feedback form question, people at an HYS event on Aotea/Great Barrier were questioned on their views about two of the goals of the Aotea section of the HGI Waste Plan.

- 'All food scraps and green waste be used beneficially on the island': to which 100 per cent of the 24 responses recorded were in support.
- 'Reducing waste coming on to the island in the first place': to which 96 per cent (23) of the responses were in support and one was unsure.

Q 3A – Themes emerging in response to goals and actions in HGI Waste Plan – Aotea/Great Barrier

Q 3A – Submissions supporting or with unspecified support for the goals and actions

There were 88 comments from people who supported the goals and actions for Aotea or had unspecified support. This included 35 comments recorded from people at the Aotea HaveYourSay event. These have been included in this analysis as most people at that event appeared to be locals or have a connection to the island.

For those who submitted feedback online, most of their comments were brief. Approximately 18 per cent did not give a specific reason for their support.

Themes that were included in a significant number of comments were:

- support for preserving the natural environment of the island (12 submissions),
- reflections on how people already divert food scraps from rubbish by composting, feeding chooks or other measures (10 AKHYS comments).
- a preference for involving locals in decision-making processes and solutions (9 submissions),
- recognition that businesses need to play a part in reducing waste coming to the island, and suggestions to help this happen (8 AKHYS comments).

Other themes that were raised in comments of the goals and actions in the HGI Waste Plan included:

- Seeking additional services/recycle options e.g. for specific problematic waste
- The wider region should not support waste costs on the island
- Tourists should take greater responsibility for their waste including packing in and out waste
- Suggestions for specific initiatives to address C&D or other waste streams.

Q 3A – Submissions not supporting goals and actions

The goals and actions in the HGI Waste Plan were not supported by 8 per cent of submissions that referred to Aotea/Great Barrier. Of the 12 submissions that did not support the goals and actions, 8 included comments. These comments included:

- keep weekly rubbish collections
- better solutions and facilities are needed for waste reduction
- responsibility for waste reduction should be on manufacturers
- new kerbside systems can be difficult for elderly residents to understand and use.

Q3A – Mana whenua and mataawaka organisational views on Aotea

Te Ahiwaru, Ngāti Whātua Ōrākei and Pare Kore Marae made no comments on the Hauraki Gulf Islands plan.

Q3A – Other organisational views on Aotea

Summary of submissions on the draft WMMP

Anamata was the only organisation from the island to make a submission. They noted their support for a separate plan for the islands and their appreciation of the work of the Local Board. Their key points included:

- support that the goals and actions of the plan for Aotea reflect community engagement and the situation
- suggestion that local solutions for C&D waste should be communicated at the resource consent stage of building projects
- Support for use/disposal of septage on the island
- Suggestion that local initiatives be funded through savings in transporting waste off island.

At the HYS event, some of the market holders and local businesses made comments supportive of initiatives to reduce waste, noting their work into ways to reduce materials, or to collect/compost items. This included recognition of barriers, e.g. for reusable packaging for microgreens, or collections of fish frames to compost, but also suggestions to work together to support waste reduction.

Question 3B – Kawau

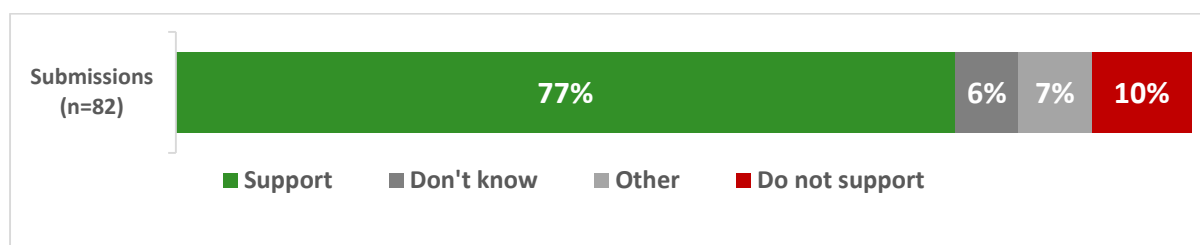
From the online submissions form:

What is your opinion on the goals and actions for addressing waste management and minimisation on Kawau?

Q 3B – Level of support for goals and actions in HGI Waste Plan – Kawau

An analysis of the level of support for the goals and actions in the HGI Waste Plan from submissions that referenced Kawau is given in Figure 7. Only those submissions that responded to this question have been included in the analysis. Submissions from individuals and organisations have been combined in this figure as the number of organisational responses is low.

Figure 7 – Level of support – Question 3B – Kawau



Q 3B – Themes emerging in response to goals and actions in HGI Waste Plan – Kawau

Q 3B – Submissions supporting or with unspecified support for the goals and actions

Of those in support or with unspecified support of the goals and actions for Kawau Island, 28 included comments, including:

- facilities should be provided for boaties to dispose of their waste
- boaties should dispose of their rubbish off-island
- waste management costs should not be subsidised by the wider region
- the same services should be provided as are on the mainland
- the current system of disposing of rubbish at Sandspit is the best.

Q 3B – Submissions not supporting goals and actions

The goals and actions in the HGI Waste Plan were not supported by 10 per cent of submissions that mentioned Kawau. Of the 8 submissions that did not support the goals and actions, 7 included a comment. The following were mentioned in these comments:

- waste management costs should not be subsidised by the wider region
- Kawau is too small to have its own plan
- current methods for residents to dispose of waste are expensive and inconvenient; the ferry company should be paid to collect rubbish from the wharves

- waste management is the government's responsibility, not council's
- visitors should be educated to take their waste with them
- there should be local input into the planning process.

Q3B – Mana whenua and mataawaka organisational views on Kawau Island

Te Ahiwaru, Ngāti Whātua Ōrākei and Pare Kore Marae made no comments on the Hauraki Gulf Islands plan including Kawau Island.

Q3B – Other organisational views on Kawau

Three organisations with connections to the Hauraki Gulf made comments.

The Sandspit Resident and Ratepayers Association did not specify their support for the goals or actions of the plan, but raised concerns over the current temporary waste enclosure on the spit which serves Kawau Islanders. They feel the enclosure is unsightly and smelly and make suggestions for other long-term solutions noting they wish to be involved in the discussion.

Localised (organisation involved in the nearby community recycling centre) supported the goals and actions for Kawau, suggesting a voucher system for Kawau residents to drop their waste/recoverable items to the Warkworth CRC.

Protect our Gulf (a community advocacy group) supported the goals and actions for the island, suggesting that Kawau and Rakino “bear the brunt of their waste disposal issues.”

Question 3C – Rakino

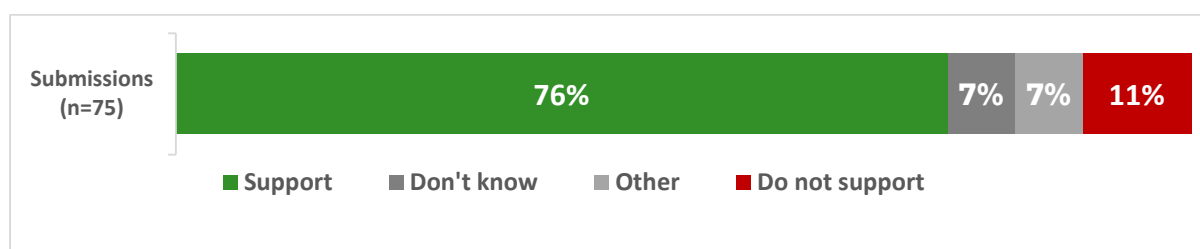
From the online submissions form:

What is your opinion on the goals and actions for addressing waste management and minimisation on Rakino?

Q 3C – Level of support for goals and actions in HGI Waste Plan – Rakino

An analysis of the level of support for the goals and actions in the HGI Waste Plan from submissions that referenced Rakino is given in Figure 8. Only those submissions that responded to this question have been included in the analysis. Submissions from individuals and organisations have been combined in this figure as the number of organisational responses is low.

Figure 8 – Level of support – Question 3C – Rakino



Q 3C – Themes emerging in response to goals and actions in HGI Waste Plan – Rakino

Q 3C – Submissions supporting or with unspecified support for the goals and actions

The goals and actions in the HGI Waste Plan was supported by 76 per cent of submissions, while a further 13 per cent of submissions were of unspecified support. Of these 67 submissions, 24 included comments. The following issues were put forward in these comments, all of which were very brief:

- facilities should be provided for boaties to dispose of their waste
- a separate weed bin for the island would be useful
- all waste should be removed from island, including a user-pays system for abandoned cars
- services should be consistent on all islands and the mainland
- island services should not be subsidised.

Question 3C – Submissions not supporting goals and actions

The goals and actions in the HGI Waste Plan were not supported by 11 per cent of submissions that referenced Rakino. Of the 8 submissions that did not support the goals and actions, 6 included a comment. Several of these had been repeated for all of the islands. The following were mentioned in these comments:

- waste management costs should not be subsidised by the wider region
- Rakino is too small to have its own plan
- waste management is the government's responsibility, not council's
- proposed goals and actions would result in little change.

Q3C – Mana whenua and mataawaka organisational views on Rakino

Summary of submissions on the draft WMMP

Te Ahiwaru, Ngāti Whātua Ōrākei and Pare Kore Marae made no comments on the Hauraki Gulf Islands plan including Rakino.

Q3C – Other organisational views on Rakino

Protect our Gulf supported the goals and actions for the island, suggesting

- that a bond be charged when cars are taken to the island to fund their disposal; and
- that Kawau and Rakino “bear the brunt of their waste disposal issues”.

Question 3D – Waiheke

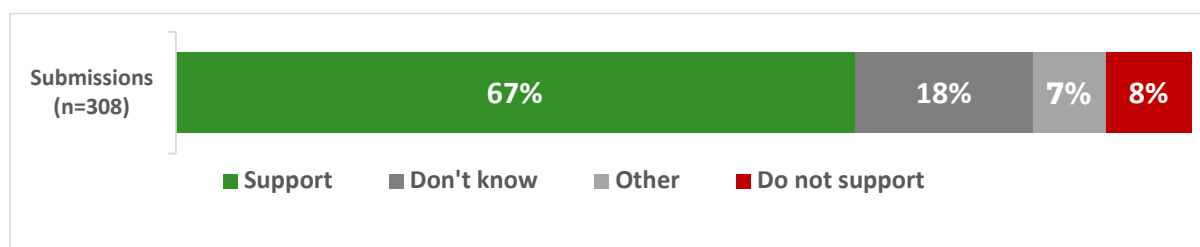
From the online submissions form:

What is your opinion on the goals and actions for addressing waste management and minimisation on Waiheke?

Q 3D – Level of support for goals and actions in HGI Waste Plan – Waiheke

An analysis of the level of support for the goals and actions in the HGI Waste Plan from submissions that referred to Waiheke is given in Figure 9. Only those submissions that responded to this question have been included in the analysis.

Figure 9 – Level of support – Question 3D – Waiheke



Of the 11 submissions from organisations, 64 per cent were in support and 27 per cent did not support the goals and actions.

Q 3D – Themes emerging in response to goals and actions in HGI Waste Plan – Waiheke

Q 3D – Submissions supporting or with unspecified support for the goals and actions

The goals and actions in the HGI Waste Plan were supported by 67 per cent of submissions while a further 25 per cent of submissions were of unspecified support. Of these 282 submissions, 100 included comments. Compared to other questions, many of the comments were quite detailed and fewer of the comments were very brief.

Of the 100 comments from submissions that supported the goals and actions or were of unspecified support, approximately 23 per cent did not provide a specific reason for their support or discussed issues that were out of the scope of the draft HGI Waste Plan. Two of these comments focussed on specific wording changes that could be made to the Plan.

In order of the frequency of being mentioned, themes in the other comments included:

- the involvement of locals in waste planning would give the best results
- Waiheke should have comparable kerbside services to the rest of Auckland
- environmental protection should be a priority
- septage and illegal dumping need to be considered
- kerbside services, including weekly rubbish collections, that would meet the needs of short-term visitors need to be provided
- consultation material is inadequate

- tourists and visitors should be more responsible for their own waste. Education was seen as a means of achieving this.
- all organic wastes should be processed on island
- a solution for noxious weeds is needed
- Waiheke waste management costs should not be subsidised by the wider region
- waste disposal should be less expensive
- all waste should be removed from the island
- the removal of public place litter bins has led to litter/dumping
- issues or suggestions to deal with particular wastes, including nappies, medical waste, septage, and C&D waste.

Question 3D – Submissions not supporting goals and actions

The goals and actions in the HGI Waste Plan were not supported by 8 per cent of submissions that referenced Waiheke. Of the 26 submissions that did not support the goals and actions, 10 included comments. These comments included:

- tourists and visitors should pay the costs of waste management
- keep with the existing system, which is already too expensive
- don't treat Waiheke differently to the rest of Auckland
- waste disposal should be free
- waste management is the government's responsibility, not council's.

Q3D – Mana whenua and mataawaka organisational views on Waiheke Island

Te Ahiwaru, Ngāti Whātua Ōrākei and Pare Kore Marae made no comments on the Hauraki Gulf Islands plan including Waiheke Island.

Q3D – Other organisational views on Waiheke Island

The Waiheke Resources Trust and Aotearoa Composters Network supported the goals and actions for Waiheke in the draft plan. They suggested several edits and additions to the text for these including:

- specifying that a future on-island solution for domestic food scraps is community-led
- specifying that council provide funding for specific initiatives
- including reference to specific existing initiatives
- adding actions to support a HGI network to share resources and identify opportunities for improvements and supporting zero waste events.

Protect Our Gulf (a community advocacy group) also supported the HGI goals and actions, and suggested:

- more zero waste education
- phase out single-use containers
- more localised composting especially on the islands
- pest plants be hot composted and not go into landfill
- airbnb / accommodation providers need to do better to keep food scraps out of landfill
- visitors add to rubbish volumes – need for education and legislation

Summary of submissions on the draft WMMP

- barge costs need to be attributed fairly across Auckland and Waiheke users.

The Carbon Neutral NZ Trust noted that the 'Waiheke report' does not place sufficient emphasis on the issue of biosolids which are major greenhouse gas emitters. They also expressed concern about 'unregulated waste dumping' on the island.

The Carbon Cycle Company (supplier of composting boxes), did not support the goals and actions, suggesting that the council divert spending on transporting food waste off Waiheke to fund the implementation of the Local Board Climate Change Action Plan to process food waste on-island.

• Question 4 – Other comments

From the online submissions form:

Any other comments?

Question 4 offered an opportunity for submitters to provide comment on any aspect of the draft WMMP or other issues. There were 566 comments made in response. Of the comments, approximately one-third did not provide feedback relating to a specific aspect of the draft WMMP. A significant number of these were positive in response to the draft WMMP, with several expressing thanks to council staff. A smaller number were decidedly negative, with a few offensive in nature.

Approximately 10 per cent of all comments specifically referred to, or appeared to refer to, the HGI Waste Plan, rather than the draft WMMP. In the online submissions form, Question 4 came immediately after the specific questions about the HGI Waste Plan. It is possible many of submitters misunderstood Question 4 as being specifically about the HGI Waste Plan.

A further 18 per cent of comments expressed negativity towards three themes that were frequently commented on elsewhere in the submissions. These were, in order of the number of comments, fortnightly rubbish collections, the removal of public place litter bins, and the new kerbside recycling standards. The opinions expressed in these comments did not differ, and in some cases repeated exactly, the opinions expressed in response to other questions.

Another 10 per cent of these comments referenced the cost implications of the draft WMMP. These comments were uniformly negative in tone and related to:

- the additional rates that will be charged for low-waste generators who currently rely on user-pays rubbish bags
- a preference for user-pays services including those provided by the private sector. Some of these comments referenced user-pays as a way to reduce waste disposal.
- the proposed reduction in services without a commensurate reduction in rates
- the effect of increased costs on those already struggling with the cost of living
- the inability of residents to opt out of unwanted services and receive a rates reduction
- the perception that services are being paid for when they are not provided.

Other issues that were raised in 5-10 per cent of comments were:

- the need for increased education through public education campaigns, targeted programmes, behaviour change initiatives, and a more widespread use of financial incentives to reduce waste
- a greater emphasis being placed on focussing on large waste producers and manufacturers of products that result in waste
- both general and specific needs for increased services and facilities to facilitate waste reduction
- the particular requirements of multi-unit dwellings that are not addressed in the draft WMMP.

Approximately 2 per cent of comments were in favour of waste-to-energy as a solution. A smaller number were expressly anti-incineration.

Long Term Plan pro forma campaign

The Auckland Ratepayers' Alliance organised a pro forma campaign, attracting 4,207 submissions. This included the following text linked to waste services:

I strongly urge Councillors to explore ways of preventing rates increases over and above inflation by cutting back office and wasteful spending, reining in Council-Controlled Organisations, and reprioritising money spent on operations and staffing to capital and infrastructure investment.

This should include:....

- Focusing on providing core council services such as effective waste management, public bins, and weekly rubbish collection.

Mana whenua and mataawaka organisational comments

Alongside suggestions noted in Q1 above, the submission from Te Ahiwaru reflected the need for:

- consistency in messaging and practices of the council around use of bins in the public realm, at home and at work
- connecting educational change with behaviour change
- putting our own (council) house in order
- opening opportunities for a rangatahi voice in implementation of the plan (referencing action A4)
- expanding food scraps collections without waiting for a government mandate as outlined in action 8.3.

Beyond the overarching suggestions outlined in Q1 above, Ngāti Whātua Ōrākei made the following points.

- The need to obtain better data from waste collectors and facilities – e.g. through the waste bylaw – as a priority.
- The need for more detailed information in the Waste Assessment; and made technical suggestions related to the future projection of waste, which in turn would inform development of a resource recovery and infrastructure plan.
- Support for the development of the Resource Recovery Network but suggesting a broadening of focus (e.g. beyond household waste) and transition to a wider strategic model for a 'Circular Resource Network', encompassing a range of facilities and services, connected virtually.
- Support for action to strengthen our focus on disaster preparedness and climate change mitigation, adaptation and resilience, noting it should be taken in the context of waste infrastructure planning.
- Support to engage proactively with the government on regional infrastructure, and not wait to engage on an Action and Investment Plan from the government.
- Suggestions to tighten and elevate actions in the plan linked to planning and consenting frameworks and a Resource Recovery and Waste Infrastructure Plan.
- Suggestions to change wording from advocating for Auckland Unitary Plan changes, to actioning those changes.

Para Kore Marae are happy to support the council in developing zero waste vocabulary and providing bi-lingual signage 'to the community'.

They also see a gap in the plan in terms of further research into the sources of plastic pollution; and stated that prioritizing resource recovery centres will help decrease waste and encourage reusable packaging and repair networks.

Pare Kore Marae also seek advocacy for a strong global plastics treaty, and a focus on waste exports which harm the environment, noting climate change impacts will still affect Aotearoa.

Other organisational comments

Multi-unit developments

Council rubbish and recycling services for multi-unit developments (MUDs) attracted comments from 20 organisations. Eighteen of these being mostly pro-forma comments from a rubbish collector (Rubbish Direct), and body corporates or other residential sector operators. They reflected dissatisfaction about the council's opt-out approach for rubbish and recycling services. This included concern that the council itself determines whether the service should be provided, regardless of whether a private service can provide a superior service; and that this is motivated by revenue raising.

The Auckland City Centre Residents Group did not comment on the opt-out approach but reflected that a lot more focus and resource needs to be put into MUDs, especially in the city centre, which has little space for waste. They seek central city facilities and suggested a number of other actions to improve services.

The Safety Collective also raised a general concern around truck movements for collections around MUDs and laneways.

Resource Recovery Network and community education

There were a number of comments relating to the council's resource recovery network (RRN). Supportive remarks from council community partners and other community organisations recognised the importance of the recovery pathways they provide alongside education and behaviour change opportunities. Further resourcing or opportunities to support the network and more broadly for education were raised. Ensuring waste minimisation education reaches ethnic communities with appropriate language and messaging was also raised (Chinese Conservation Education Trust).

Three organisations sought additional recovery infrastructure or community recycling centres in their local areas (city centre - Auckland City Centre Residents' Group and Refugee Education for Adults and Families; and Mangere - ME Family Services).

Commercial entities had more mixed feedback on the RRN ranging from support for expansion (Winstone Wallboards) to concerns that subsidization of the network by ratepayers/the waste levy undermines commercial resource recovery (the Waste & Recycling Forum) or that the RRN may duplicate infrastructure (NZ Association of Metal Recyclers).

Waste to energy, landfills and exporting waste

Six community organisations repeated or supported Zero Waste Network's request that the council rule out incineration as a disposal option for mixed waste noting a number of reasons why it should be appropriate. In contrast, Rubbish Direct supported waste to energy for difficult waste streams like contaminated plastics; and WMNZ noted the benefits of their landfill gas capture used to generate electricity.

WMNZ also ask the council to identify landfills in their planning as regionally significant infrastructure noting capacity limitations and restrictions of existing landfills serving the region; while the Packaging Forum sought confirmation of the council's position on the Wayby Valley Landfill.

There were contrasting views of the appropriateness of exporting waste; which was recognized as necessary by some businesses (e.g. The Packaging Forum, the NZ Association of Metal Recyclers) but not supported by various non-governmental organisations (e.g. Aotearoa Plastic Pollution Alliance, Pare Kore).

Other comments

Other specific concerns or suggestions raised by organisations included:

- Unsupportive of regulation which may have unintended consequences where all industry players aren't consulted e.g. the levy drives Construction and Demolition waste to other fills (Enviro NZ)
- Similarly, concern that increasing the waste levy will increase illegal dumping when commodity prices are low (NZ Association of Metal Recyclers)
- Support for planning and systems to address waste generated in disasters like the 2023 flooding (Tamaki Wrap Charitable Trust)
- Suggestion for an increase in Waste Minimisation and Innovation funding including maximum amount, and focus on supporting businesses to tap into the Ministry for the Environment's fund– (Wilkinson Environmental)
- Suggestion to support farmers in various ways including financial incentives and education, including a note that "the essential ability to responsibly burn or bury residual waste on-farm is retained." (Federated Farmers)
- Not supportive of co-mingled glass in kerbside collections noting higher value from source-separated collections (Glass Packaging Forum)
- Recommending examples be provided in the plan of private sector engagement beyond the waste sector e.g. including all take back facilities for soft plastics or food and beverage cartons in the region in the plan (the Packaging Forum)
- Suggestions to add further detail to the text to reflect various aspects of waste minimisation (Zero Waste Network)
- Seeking for Auckland to become a repair city through developing more repair actions / initiatives / advocacy and championing repair (Repair Café)
- Suggestions to adjust text to reflect various points around recovery of resources and expand definition of zero waste target beyond municipal landfills (WMNZ)
- Clarification on the position on Wayby Valley Landfill in the plan (Packaging Forum).

