

9 December 2021

[Parents for Climate Aotearoa](#) is a group of largely parents and wider whānau, concerned with our families and particularly the future of our tamariki and mokopuna in a rapidly warming world. Our parents come from a range of backgrounds and experiences. We are ordinary parents standing up for climate justice, to ensure all children have a safe climate and world to live in.

Circular Economy

What our circular economy could look like in ten to thirty years really depends on the courage and imagination of our government and the steps we take towards it. Creating a strong vision is important, and worth investing in. Internationally, there are visions already created that we could use to develop an inspiring vision that works for Aotearoa:

- see [Zero Waste Europe](#)

When developing a vision, we think it's important to focus on what we can GAIN from a circular economy. Many people will see changes in this space as a sacrifice or a loss of what we have now, but **a circular economy can offer us so much, like increasing ties with the community, reducing mental load in terms of decision making, and reducing household costs.**

On one end of the scale, we could be looking at a greenwashed version of the current reality, with a lot of compostable and “sustainable” (but still ultimately disposable) packaging and waste that feeds a bioeconomy, which allows us to think that our waste is not so bad. Our economic drivers could be adjusted, but not transformed, rewarding “green growth” and recycling rather than true waste reduction and circularity.

At the other end of the spectrum of possible outcomes, we could have an economic system that has confronted consumption and consumerism as the elephant in the room and recognises that we cannot continue pumping more and more into the top of the waste hierarchy and finding ways to deal with it. We could have strong public educational campaigns that acknowledge a need to scale back at every level to achieve our goals. **This public education campaign would be supported by a shift away from GDP to new measures of success, and government policies that empower communities and households to reduce waste and regenerate natural systems.**

The question of what things could look like in 2050 is particularly difficult, because there are so many ways things could go in the next thirty years, and the direction is highly dependent on the government's action or inaction now.

We think that a strong circular economy would require:

- **commitment to producing and consuming less**, as well as improving how we deal with waste
- **regulations and/or support at many levels** (e.g. manufacturers, retailers, consumers, waste companies)
- **clear accountability and financing** to enable and encourage action towards the goals

We also need to measure the circular economy and change our economic levers to measures that recognise and reward circularity, rather than focusing heavily on GDP, which encourages an extractive economy.

Bioeconomy

We believe that our emissions reduction plan should coordinate strongly with existing plans and strategies, particularly the Climate Change commission recommendations, to avoid double work and endless consultation without action. Therefore, we would be happy to use their definition of the bioeconomy:

“The ‘bioeconomy’ refers broadly to the parts of the economy that use renewable biological resources (biomass) to produce food, products and energy. When it incorporates circular economy principles, a bioeconomy can use biomass residues or waste from forestry, fisheries, agriculture and households as raw materials to produce other products.”

We think it is particularly important that our bioeconomy agenda is strongly tied with our circular economy principles, and doesn't encourage increased activity/emissions in order to supply the bioeconomy.

The bioeconomy may be useful as a transition tool and form a part of the final circular economy, but **in the long term we see a strong circular economy with reduced production/consumption and transformative economic levers to be a more powerful approach to reducing waste** (and thus the emissions from waste).

Circular economy strategy

A robust circular economy strategy in Aotearoa would connect strongly to existing government strategies and plans (i.e. the wellbeing budgets) and would be tied into our measures of success at a high level. This would mean the strategy would align with the government's other goals, and would get top-down support.

We believe an effective strategy would also include a strong communication plan, to ensure bottom-up action and as many people as possible on board with the goals of the circular economy. To achieve this, we believe the strategy needs to be engaging and accessible. **Rather than multiple strategies across different areas/sectors, we would like to see a cross functional, wide reaching strategy that allows for cohesive messaging and more effective consultation.**

Bioeconomy inclusion within a circular economy strategy?

Yes we agree with this. However, we need to be aware of the limitations of the bioeconomy in driving a circular economy. **The bioeconomy is better than the status quo, but is still ultimately an extractive/consumptive economy.** As well as creating circularity, we need to ensure economic levers encourage putting less into circulation.

Potential proposals

We support the working principles of a circular economy listed in the discussion document, particularly:

- **designing out waste**, pollution and emissions, and unnecessary use of materials
- **taking a whole-of-life approach** to materials and products, and eliminate waste and pollution through design and planning
- **thinking in systems**, where everything is interconnected

However, it is hard to see from the document what the plan is to achieve these ideas. As a comprehensive strategy could take some time to develop/consult on etc., **we believe that we need to start to act in this direction before drawing up a comprehensive strategy.**

There are many community groups around Aotearoa working in this space ([Zero Waste Network](#), local zero waste groups (e.g. [The Junction in New Plymouth](#), [Xtreme Zero Waste](#) in Raglan)). **One option for quick action would be to tap into that network and fund these groups to develop local action plans that align with the working principles discussed.** This funding could also be delivered through local councils, many of which are already working with local groups to pursue steps towards a circular economy.

We agree with the call from Zero Waste Network in their submission on this plan for “an agency dedicated to the circular economy, resource efficiency and conservation, to reduce silos, build a shared understanding, and enhance coordination.”

Barriers

We see the main barriers to a move towards a circular approach

- A strong cultural norm of consumption and capitalism.
- Entrenched individual and business behavioural habits.
- A lack of incentive/desire to change away from the status quo.
- A perception, particularly in business, that the cost of change will not be worth the climate payoff.
- A lack of comprehensive and urgent action in that direction from the government.

Transitioning to a circular economy also requires a high level of coordination across government and other agencies. Our current government approaches tend to be siloed (as demonstrated in this discussion document), and **political courage is required to find ways of working across these silos to transform our economy.**

Cross sector regulations and investment

We believe that the priority should be for investment in small, local solutions that deliver funding through trusted community leaders and enable quick action.

Our view

We believe this space needs much more ambitious and quick action than it has received so far. The emissions reduction plan discussion document heavily focuses on developing strategies, but this risks delays in action and implementation, which are important and urgent now.

Target to reduce waste biogenic methane emissions by 40 per cent by 2035

We support the target to reduce waste biogenic methane emissions from waste by 40% by 2035. We would like to see the major focus of the plan to be on reducing waste, with diversion of waste streams and capturing emissions supporting this but not taking away from the overall goal.

The waste hierarchy diagram that is included in the ERP discussion document (p. 102) is a key piece of information and a guide to strategy in the area of waste. We believe the major focus should be on the top three areas of the hierarchy: Rethink/Redesign, Reduce, Reuse/Repurpose.

Funding for education and behaviour change

We believe behaviour change is essential in the waste space, and would support funding education and initiatives, particularly those aimed at reducing waste. We encourage all educational initiatives, particularly at the household level, to drive towards a just transition (e.g. by focusing on low- and no-cost solutions, and by including diverse voices and strategies).

We support the Zero Waste Network call for “incentives and investment for new business models, such as regenerative urban horticulture, that localise food supply chains”. Growing the urban farming sector, coupled with localised composting, also has potential to offset a range of inefficiencies in the food system while providing a wide range of benefits to local communities.

While the waste hierarchy was included in the plan, the actions included seem to focus lower in the waste hierarchy. **We believe that our action in the space of waste should focus high on the waste hierarchy (Rethink/Redesign/Reduce) and also high in the supply chain (at the manufacturer and retailer level, rather than focusing on individual household behaviour.)**

Behaviour change education should also focus on reducing barriers to change and making the changes we’re asking for as easy as possible. This will help to minimise resistance and drive action. **Communication should avoid confrontational approaches and moralising;** as we have seen with Covid-19, particularly in the latter phases of the pandemic, people react strongly against being “told what to do”.

Support policies

The best way to reduce disposal costs is to implement zero waste and circular economy strategies across society to drastically reduce the need to dispose of waste in the first place.

Rather than focusing on individual behaviour, **we would like to see these impacts managed with systemic responses that use regulation and economic levers** to drive responsibility for this issue back to retailers and manufacturers. These could include:

- policies that guarantee a right to repair,
- a right to return packaging to manufacturers/retailers to discourage overpackaging,
- a ban on discounting that encourages food waste (e.g. multibuys)
- Food rescue programmes
- packaging requirements for manufacturers at all steps of production requiring recyclable or reusable packaging

There will also be a need to prioritise local-scale actions and strategies that grow community resilience and connectedness, provide local employment and economic opportunities, and keep resources and finances flowing internally rather than being extracted by multinational companies.

Disposal of food, green and paper waste at landfills ban

Yes, we would support a ban on these wastes at landfill within this timeframe. We believe this ban should apply also to organisations and institutions (schools, hospitals, government agencies etc.)

However, we can identify many gaps in our current infrastructure that would make this challenging currently, and would need to be worked out in the short term to achieve this goal. Some of the barriers that would need to be worked through include:

- Business behaviour change
- How we deal with public rubbish bins and the individual behaviour around them.
- The responsibility of sorting “tainted” bins (e.g. where bins collected include banned items)
- Making it easier for people to change behaviour with consistency of collections in different areas/businesses.

When it comes to recycling this waste, we prefer composting (vs. other disposal methods, and **would like to see small, local solutions (where appropriate) to support local circular economies and empower communities** vs larger/black box solutions that hide waste from communities.

We would also like to see this strategy include a ban on edible food wastage from businesses (similar to the law France introduced in 2016). This could include support of existing or new local charities that work to divert edible food waste to people who need food, which benefits local communities and families as well as reducing emissions from food waste.

A ban all organic materials going to landfills that are unsuitable for capturing methane gas

We support this move. Additionally, the discussion document acknowledges the risk that “relatively cheap disposal for Class 2–5 landfills undermines reduction and resource recovery alternatives” (p. 103).

We support the suggestions from the Zero Waste Network submission for managing this risk:

- a meaningful increase to the waste disposal levy for Class 2-5 landfills
- Designing exclusions for organic waste disposal into the licensing regime for operators Class 2-5 landfills, as well as requirements to separate and send materials for reuse/recycling/composting for licensed operators at other parts of the resource recovery system

- bringing forward the enforcement date for a disposal ban on these landfills to align with the date at which LFG capture systems must be installed for class 1 landfills (e.g. by 31 December 2026).

Potential requirement to install landfill gas (LFG) capture systems at landfill sites

Maybe. We should consider that LFG systems are expensive and cause other emissions in their manufacture.

Thus, we would want to ensure that our measures have suitability considering the cost and manufacture emissions of new systems. We would also want to ensure that the drive towards LFG systems did not interrupt the focus on reducing waste in the first place.

This is not only because waste reduction would avoid methane generation, but also because organic waste in landfill is valuable and should be re-diverted back to our soil, to improve soil health and restore our natural environment.

Standardised approach to collection systems for households and businesses, which prioritises separating recyclables such as fibre (paper and cardboard) and food and garden waste

We support this. We believe that simplicity across collection systems would drive behaviour change towards recycling and composting by removing confusion for individuals moving between different areas.

However, we agree with Zero Waste Network, and **would caution that kerbside collection should not disrupt local activities such as community-based composting networks and resource recovery centres.** These local systems offer significant co-benefits such as keeping resources and jobs within communities, minimising transport of waste, and enhancing soil health.

Transfer stations should be required to separate and recycle materials, rather than sending them to landfill

We support this move. Requiring the separation of materials at transfer stations allows improved recycling, but also opens up opportunities beyond recycling and helps us to move further up the waste hierarchy. With clean and separate streams, such centres can create opportunities to reuse, repair, remanufacture and repurpose products and materials.

Proposals in ERP and farm dumps

Ideally these proposals would apply to farm dumps, but we recognise that policing this requirement could be difficult and may not be worth it.

If farms are focussing on methane emissions, it might be more valuable for them to focus on agricultural methane. But we see that behaviour change and educational initiatives in this space could be helpful, particularly in terms of separating organic wastes from farm dumps and reducing waste overall. One way to drive the desired behaviour could be to include methane emissions from waste in the farm level planning required by the He Waka Eke Noa strategy.

Alternative ideas on how we can manage emissions from farm dumps, and waste production on farms

We believe that these emissions should be captured in the farm-level emissions plans included in He Waka Eke Noa agriculture strategy, and their reduction should be driven through that strategy.

Options that could significantly reduce landfill waste emissions across Aotearoa

We believe that this strategy must be connected to broader waste strategies and question the need to separate out the methane emissions from waste from our wider waste strategies. We believe the policy drivers for waste emissions need to account for a wider range of impacts than those included in this plan, and encourage a holistic cross-sector approach to waste that aims to really transform how Aotearoa views and deals with waste in a much broader sense.

We also believe that a more holistic view would aid in the effectiveness of communication and educational initiatives. **Multiple plans across different specific areas are unlikely to engage people in behaviour change, and we should focus on a strong and inspiring vision that shows people how reducing waste can benefit their household and their communities.**

We also see some potential in financial incentives to reduce waste. These could apply at the household level (e.g. rates reduction for infrequent waste collection) or at business level (e.g. correcting the financial levers for businesses that make it currently more expensive to recycle than dump to landfill in some areas).

Reference:

[Zero Waste Network Submission](#)

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