

Waste Strategy and Legislation
Ministry for the Environment
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Submission: Te kawē i te haepapa para | Taking responsibility for our waste: Proposals for a new waste strategy, Issues and options for new waste legislation

General Introduction

1. Our Seas Our Future (“OSOF”) is a not-for-profit- organisation that aims to protect New Zealand’s coastal and marine ecosystems through advocacy, education, and environmental stewardship, ensuring that they are managed sustainably and protected for future generations.
2. Our membership includes a diverse group of science practitioners, professionals, and specialist researchers working in ecology related fields, as well as marine conservation and sustainable development.
3. OSOF supports the Ministry for the Environment for wanting to rethink how Aotearoa approaches waste issues, and making progress to move towards a circular model. This is part of a longer-term goal of moving to a sustainable, productive, inclusive and low emissions society for Aotearoa.
4. OSOF welcomes the opportunity to comment on the Ministry for the Environment’s proposal document, Te kawē i te haepapa para: Taking responsibility for our waste.

Our Submission

Aotearoa's biodiversity and ecosystems are unique and diverse. Due to being geographically isolated for a long time, our native flora and fauna has evolved specifically to our environment. Aotearoa is classed as a "biodiversity hotspot" due to having a high number of endemic species, and we have around half of the world's cetacean species (whales, dolphins, and porpoises) recorded in our waters.¹

The oceans surrounding us are home to a rich variety of tāonga species, such as the iconic pygmy blue whale, New Zealand sea lion, Yellow-eyed penguin, Maui and Hector's dolphins, as well as thousands of other species calling our environment home. In total, around 30 percent of our biodiversity is found in the marine environment. Aotearoa is also the seabird capital of the world, having a greater range of seabirds nesting and breeding on our islands than anywhere else.²

Our society is intertwined with our indigenous biodiversity - indigenous biodiversity is central to our mental and physical health, cultural identity, and economy. We have a collective responsibility to protect and conserve our unique tāonga species and our actions today and the decisions you make as the Government moving forward will leave a long-lasting legacy for marine conservation. Drawing on Te Ao Māori and the whakataukī *ki uta ki tai*, everything is connected, and what happens on land will affect the marine environment.

As reported in *Environment Aotearoa 2019*, close to 4000 native species in our country are threatened or at risk of extinction.³ This includes 22 percent of all marine mammals, 90 percent of all seabirds, and 80 percent of all shorebirds in Aotearoa.⁴

New Zealand's current waste cycle is a key threat to these vulnerable species. Harmful plastics and rubbish have made their way into coastal and marine environments through poor waste disposal, management, and overall, how our society recognises rubbish. The

¹ OECD Environmental Performance Reviews: New Zealand 2017. Paris: OECD Publishing.
<https://dx.doi.org/10.1787/9789264268203-en>

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https://d3n8a8pro7vhmx.cloudfront.net/beachheroes/pages/13966/attachments/original/1600465992/Thriving_Oceans_Plan_policy_document.pdf?1600465992

³ <https://environment.govt.nz/publications/environment-aotearoa-2019/>

⁴ <https://environment.govt.nz/publications/our-marine-environment-2019/>

health of our protected species and marine wildlife are threatened by our poor decisions and management, causing injuries, infections and deaths from ingestion, asphyxiation, and starvation.⁵ Furthermore, plastic waste and other rubbish that is found in the ocean can spread toxic bacteria and other organisms that may harm fragile ecosystems and wildlife.⁶

Internationally, ocean health is in sharp decline due to human activity.⁷ This is despite the fact that oceans play a pivotal role in limiting climate pollution, by potentially taking up more carbon dioxide than our forests and alleviating the burdens of excess carbon dioxide on our planet.^{8 9} Our oceans act as a major carbon sink, absorbing about 30 percent of the carbon dioxide emitted by human activities since pre-industrial times. Oceans have also absorbed 90% of the extra atmospheric heat associated with global warming, and regulate our climate and influence our weather.

Aotearoa's current approach to waste management is egregiously impacting our greenhouse gas emissions, with green-waste diverted to landfills responsible for around 9% (2019 data) of our country's methane emissions.¹⁰ The most recent Intergovernmental Panel on Climate Change report states that to limit heating to 1.5°C or 2°C, carbon dioxide emissions must reach net zero, and other emissions such as methane and nitrous oxide must also be strongly reduced.¹¹ We need to put strong measures in place to ensure our waste cycle systems do not continue to adversely affect our coastal and marine environment.

Similarly, without proper resource management we are at grave risk of damaging and losing our precious, native on-shore habitats that improve our resilience to the adverse effects of climate change. For example, habitats like wetlands and estuaries hold and filter sediment,

⁵ Derraik, J. G. (2002). The pollution of the marine environment by plastic debris: a review. *Marine pollution bulletin*, 44(9), 842-852.

⁶ Gregory, M. R. (1999). Plastics and South Pacific Island shores: environmental implications. *Ocean & Coastal Management*, 42(6-7), 603-615.

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https://www.globalcitizen.org/en/content/87-of-worlds-oceans-are-dying-climate-change/?utm_source=paidsearch&utm_medium=ausgrant&utm_campaign=genericbrandname&gclid=CjwKCAiA78aNBhAlEiwA7B76pzzmh9boEgAnEYviGUfQBwUdv5TsohsVzpyfo-xl_5zf0FzXCrxYBoCeEwQAvD_BwE

⁸ https://www.ipcc.ch/site/assets/uploads/2018/02/WGIIAR5-Chap30_FINAL.pdf

⁹ <https://www.tandfonline.com/doi/abs/10.1080/14693062.2012.620788>

¹⁰ <https://www.stuff.co.nz/environment/climate-news/122549936/why-climateheating-methane-escapes-our-landfills>

¹¹ <https://www.stuff.co.nz/environment/climate-news/126014839/planetary-healthcheck-delivers-unprecedented-terrifying-picture>

which prevent it from being carried out into the wider marine environment and negatively affecting the vital benthic zone, while habitats like mangroves and seagrass meadows provide shelter for many species.¹²

OSOF honours Te Tiriti o Waitangi by showing our support to tangata whenua of Aotearoa and wishes to draw attention to the lack of consultation with Māori in putting this proposal document together. As Te Tiriti partners and protectors of te taiao, the Crown is obligated to partner alongside tangata whenua. However, this proposal document does not appear to represent an adequate Crown and Māori partnership in its current form.¹³ We also note that Pare Kore are referenced in the proposal document but weren't consulted with during the planning and drafting stages. They have knowledge and expertise with Te Ao Māori and mātauranga Māori and should have been leading the drafting of this proposal document. As stated by Pare Kore in their submission, iwi, hapu and marae operate under a 'circular economy', and have done so for centuries prior to colonisation. Adopting eurocentric circular economy and legislative models is an improper response to Aotearoa's history and the obligations under Te Tiriti.

Additionally, we see no benefit to adopting a United Kingdom duty-of-care model for our waste legislation. Aotearoa is a country that was established under Te Tiriti o Waitangi, and this relationship, a partnership between Māori and the Crown, should be driving our waste reduction strategy and legislation reforms.

Data referenced in the proposal document states that "issues relating to waste and recycling made up three of the top ten concerns for New Zealanders," (p. 6).¹⁴ This clearly shows that people are concerned about our waste legacy and are also aware that changes need to be made. We therefore disagree with the proposed timeline in its current form and believe that pushing targets out to 2050 only prolongs the issues, and places additional pressure on future generations. Monumental change is required to address our multifaceted

¹² <https://environment.govt.nz/publications/our-marine-environment-2019/>

¹³ <https://waitangitribunal.govt.nz/assets/Documents/Publications/WT-Principles-of-the-Treaty-of-Waitangi-as-expressed-by-the-Courts-and-the-Waitangi-Tribunal.pdf>

¹⁴ https://consult.environment.govt.nz/waste/taking-responsibility-for-our-waste/supporting_documents/waste-strategyandlegislationconsultationdocument.pdf

environmental issues, and this proposal document does little to address the urgency that is needed.

The proposal document emphasises the fact that transformative change (or cutting waste at its source) is essential. However, the Government provides very little guidance on how New Zealand might achieve such 'transformative change'. For example, the proposal document suggests that, "reducing emissions from organic waste by reducing the amount generated, diverting more from landfill and improving capture of any methane that landfills produce" is a main priority, through to 2030. OSOF is of the view that such priorities should include more specific direction. New Zealanders need more guidance and proactive central government leadership around how these priorities should be achieved.

Product stewardship and producer responsibility must drive the waste reduction strategy and legislative reform. Producers, manufacturers and industry must face responsibility for producing wasteful and single-use products, and should be strongly encouraged to invest in affordable reusable options or ensure that materials can be properly and efficiently restored or repaired. Consumers and individuals bear the costs of disposal and removal of single-use products, while trying to invest in having more reusable options in their household. These options can sometimes be expensive and inaccessible to people with disabilities and to our younger and older population.¹⁵ We therefore need to ensure that moving forward, our waste reduction strategy and legislation provides robust and clear product stewardship schemes that align with the waste hierarchy, and focus on rethinking their design systems and offering reusable products.

OSOF supports the Ministry for the Environment for wanting Aotearoa to move towards a circular model of waste management. However, we call for faster, more proactive and urgent action, in order to protect our precious and vulnerable marine life tāonga, and our natural environment. We want to see strong, effective leadership and partnership between the Crown and Māori, and a redesigned waste management system that is grounded in Te Ao Māori and mātauranga Māori, with ambitious timeframes in place.

¹⁵ <https://takeawaythrowaways.nz/inclusivity>

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