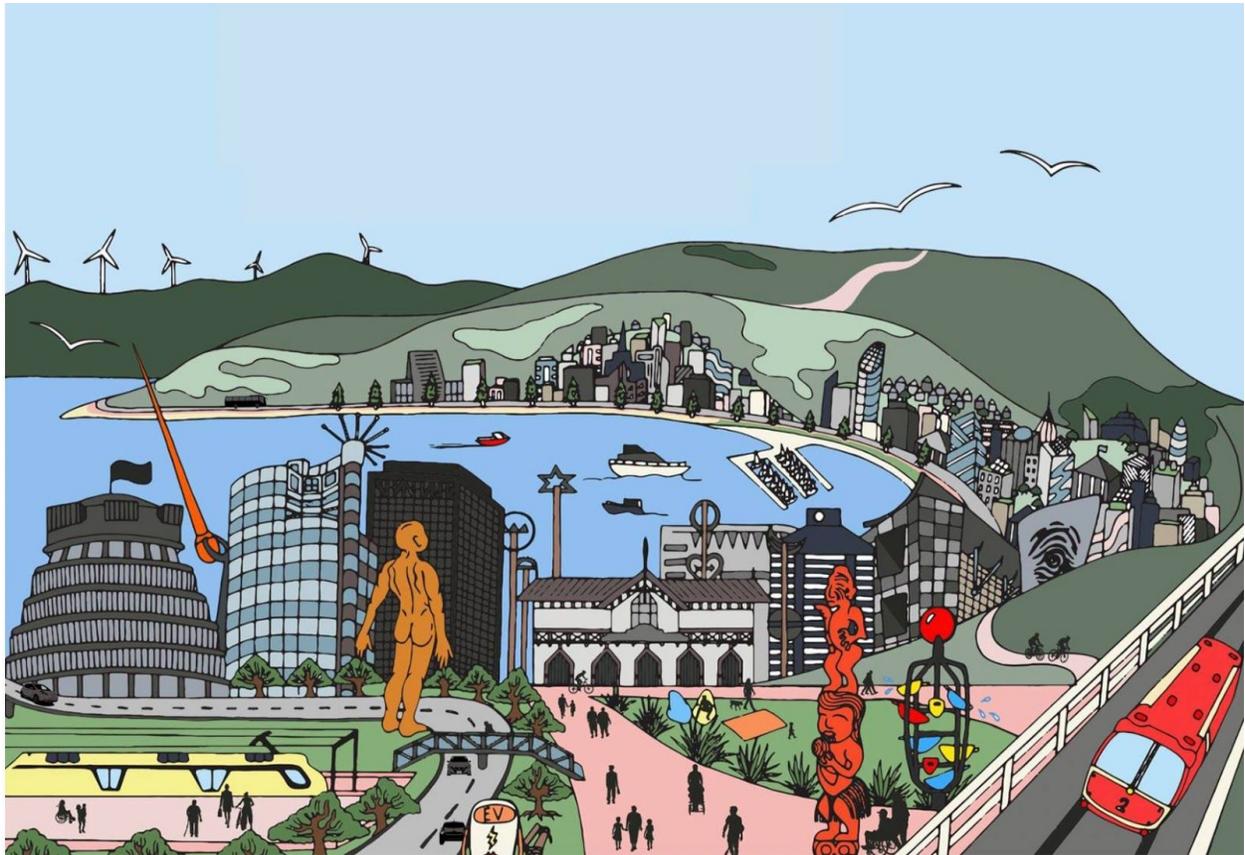




Generation Zero



Generation Zero's Submission to

**Wellington City Council Solid Waste
Bylaw**

Generation Zero supports the review and update of the waste-related provisions of the bylaw, however we feel this proposal is not ambitious enough to ensure a zero waste future in a circular economy. We agree with the points and suggestions raised in the [submission of Sustainability Trust, The Rubbish Trip, Kaicycle, and Wellington Waste Managers](#).

Even though the Waste Management and Minimisation Plan of 2017 is severely inadequate and needs reviewing, this proposed bylaw and control still does not go far enough to achieve the reduction goals set out in this plan. Wellington City Council has declared a climate emergency, and landfill emissions make up the largest portion of their current emissions profile, yet this bylaw does not use language appropriate to this crisis.

This bylaw places a lot of focus on diverting waste, and the provision for junk mail is the only aspect that seeks to actually reduce waste at its source. The focus needs to shift from 'managing' waste to 'minimising' waste.

From speaking to council officers, it is clear that the primary goal of this bylaw is to gather information on waste streams in Wellington City in order to justify future investment in waste reduction and diversion facilities. While we accept that there is an information deficit in Aotearoa with regards to waste, we do not believe that the council has time to conduct such a long winded information gathering exercise *before* acting, as it is likely that once implemented, this bylaw won't be updated for another decade.

We need to half emissions by 2030 and already know that Wellington has a severe waste issue that is making a strong contribution to our carbon emissions profile. This is enough justification to invest and introduce stronger bylaws *now*.

We agree with the points raised by Sustainability Trust, The Rubbish Trip, Kaicycle, and Wellington Waste Managers in regards to C&D waste, and would also add that requiring Site Waste Management Plans without a set diversion target is unacceptable. These should be Site Waste *Minimisation* Plans and should include an enforceable diversion target.

While we realise options for diverting C&D waste in Wellington and the wider area are limited at present, there are *some* options and the council should set a target to support these, even if it is low. For instance, there is a deficit of aggregate in the region at present and Centre Port has recently acquired a concrete crusher which means that diverting concrete rubble is now achievable (and profitable). If the [BNZ building demolition](#) is set to achieve a waste diversion of 95%, then setting a low waste diversion target in Wellington (perhaps 20-30%) is surely achievable.

From discussion with council officers, we have heard that there has not been an attempt to approach contractors in Wellington City to enquire what diversion rates they are able to achieve at present. As most large contractors already complete SWMPs, this data is likely already

available, and we expect that some companies would provide this data willingly if it would contribute to a case for a C&D recycling facility. Taking a solely data gathering approach to C&D waste in Wellington with this bylaw, without having made efforts to seek existing information, is not good enough.

We have been impressed by the quality of recent consultation documents from Wellington City Council and the efforts being made to communicate complicated issues in an effective, clear and engaging manner. In comparison, we feel this consultation has been poorly presented.

The information was arranged in a way that made it difficult to locate the relevant information to support statements made in the summary, and the summary was too high level to be useful. It was difficult to make sense of the information provided and the intent behind it without discussion with council officers and other submitters.

In conclusion, Generation Zero generally supports the overall intent of this bylaw and proposals within but it does not go far enough to address waste in this city, or the associated emissions. We need to be making urgent moves towards a zero waste, circular economy if we are going to achieve our zero carbon aspirations.

Ngā mihi nui,

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