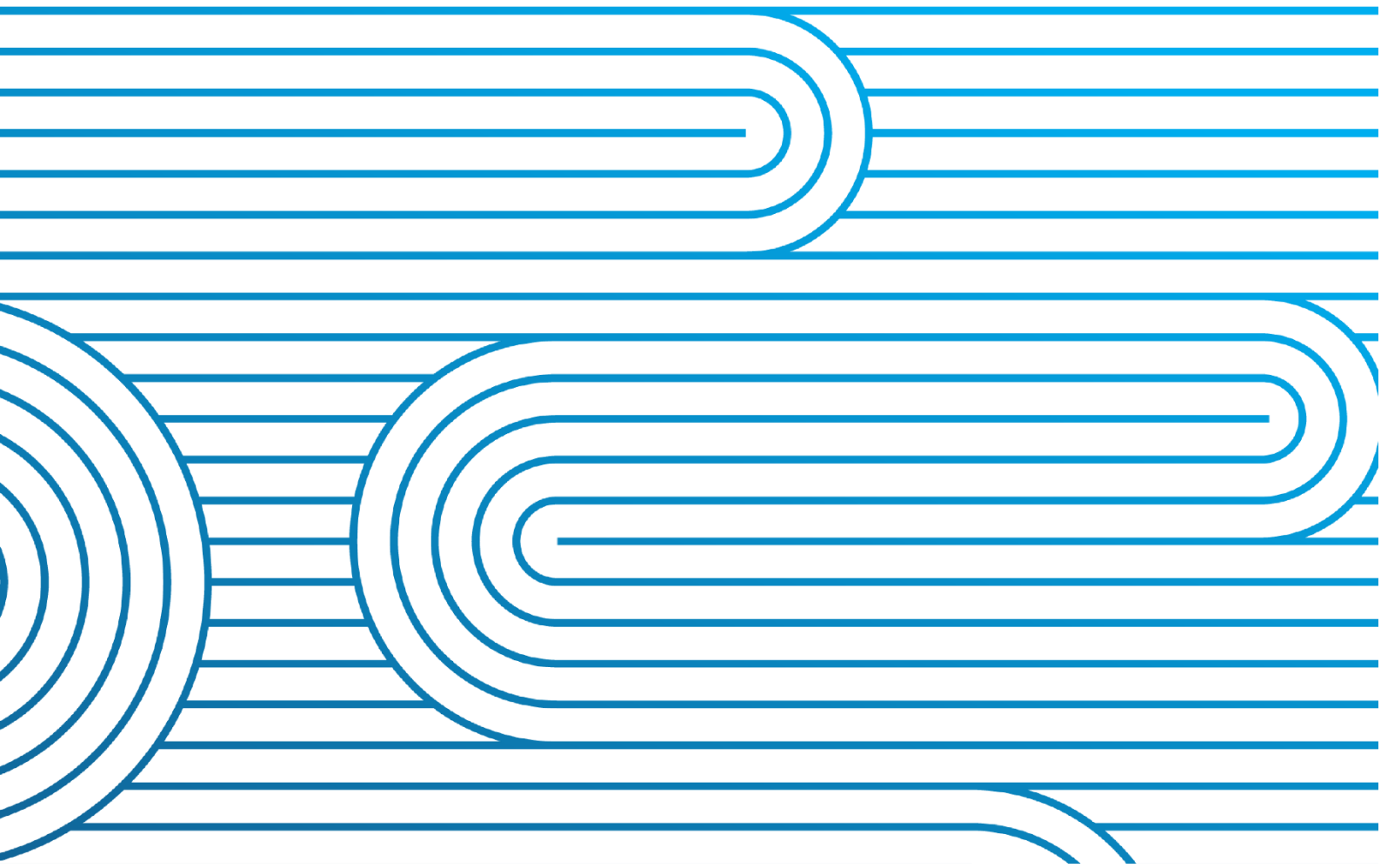


Submission to the Ministry for the Environment

On the Ministry's Te kawe i te haepapa para, Taking responsibility for our waste:
Proposals for a new waste strategy; Issues and options for new waste legislation

10 December 2021



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Executive summary

Transpower broadly agrees with the Ministry for the Environment's recommendations that Aotearoa needs to fundamentally change our approach to waste management to ensure a more sustainable and equitable future.

The waste management philosophy and circular economy envisaged by *Taking responsibility for our waste: Proposals for a new waste strategy; Issues and options for new waste legislation* (the Waste Strategy) will set direction for our people and our businesses for the foreseeable future. It is critical that we make these changes in line with a sustainable, net zero carbon future. We concur with the Ministry that a significant number of initiatives are already underway to improve waste management practices. However, considerable work is required by all of Aotearoa to ensure our waste management quickly transitions to a circular economy. The journey will not be easy, so consideration of appropriate transition measures will be important.

Given the nature of Transpower's activities, we have additional complications that need to be worked through, including during any transition:

- unique waste streams, which have no immediate solutions, such as hardened glass insulators and specialist electronics;
- volume – our assets are big.
- our assets cover the length and breadth of the country, but waste infrastructure is patchy.

Through our submission, we highlight key opportunities for the Waste Strategy and the importance of strengthening the alignment of the entire legislative and policy framework and ensuring they remain aligned, so Transpower, and other infrastructure providers, can help Aotearoa ensure a low waste future.

We recommend a number of improvements, including:

- the final Waste Strategy identify potential opportunities for the New Zealand Government to influence international action and outline any plans to participate in that space;
- improving the availability of information on waste infrastructure. By way of example, developing a database of waste infrastructure, including where it is available, and for what materials;
- the final Waste Strategy clarifying (perhaps graphically), which waste streams are likely to be captured by the data improvements and which might not be;
- a commitment to both review, and potentially revise, the waste targets within the final Waste Strategy, as well as to develop a stronger indication of what contribution the various waste management initiatives make to achieving the targets (as data improves)

Transpower's interest in the draft Waste Strategy

Transpower New Zealand Limited (**Transpower**) is the State-Owned Enterprise that owns, operates, maintains, and upgrades New Zealand's high voltage electricity transmission network, the National Grid. Its roles are to reliably and efficiently transport electricity from generators to distributors and large users, and to operate a competitive electricity market and deliver a secure power system.

Transpower has started its journey to affect a step change in its management of waste and this journey is well aligned with the direction being proposed by the draft Waste Strategy. Our actions on waste have provided us with insights into the scale of the opportunities and challenges to a more efficient management of waste across our operations.

Our current initiatives to improve waste management include:

- quantifying our waste streams, both those under our direct control and those managed for us by operation and maintenance activity suppliers;
- developing a waste minimisation plan with targets for waste reduction;
- developing an asset disposal policy that provides clear guidance around the options for the management of end-of-life assets;
- piloting waste management planning on construction projects; and
- investigating mineral oil alternatives in transformers and optimising transformer oil management, regeneration and re-use.

Against that background, Transpower strongly supports the development of the Waste Strategy and associated regulations to strengthen national consistency and provide certainty in the management of waste for Aotearoa.

Detailed submission

Transpower supports the longer-term goal sought by the draft Waste Strategy of moving Aotearoa towards a circular economy, including refinement of product stewardship mechanisms. It is clear that success in this area requires action at both the national and international level. Products are purchased or sourced internationally and their longevity, recyclability, raw material use and other aspects that shape how sustainable a product is, are often characterised offshore. It would be useful for the final Waste Strategy to identify potential opportunities for the New Zealand Government to influence international action and any plans to participate in that space.

Transpower supports the initial emphasis to act to strengthen capacity in the middle of the hierarchy (identified on page 28 under 'The task ahead'). Based on our waste minimisation experience to-date, our view is this will likely be amongst the most effective means for bringing the country up to global standards (which is a stated goal of Stage 1 of the draft Waste Strategy).



Transpower has faced many challenges finding viable and consistent alternatives to waste disposal, largely due to the geographic variability in the availability of waste infrastructure across Aotearoa. Further, lack of knowledge of what capability exists (and where this capability is located) has been a major barrier to driving successful waste minimisation for Transpower. On this basis, we support the strategic priority (page 29) for more focused investment in onshore processing and recycling capacity and in particular, the proposal (page 71) to consider using the waste levy for investing and co-funding waste infrastructure. Further, we would support government improving the availability of information on waste infrastructure, for example developing a database of waste infrastructure, including where it is available, and for what materials.

Transpower's experience of embarking on action to better understand and manage waste has identified that a detailed understanding of waste data is critical to planning for its better management. It is our experience that a paucity of waste data prohibits the identification of priority areas for waste minimisation action and the setting of waste reduction targets.

We recognise that waste data improvements are anticipated to arise through changes to the waste levy and potentially through licencing systems. It would be useful for the final Waste Strategy to clarify (perhaps graphically), which waste streams are likely to be captured by the data improvements and which might not be.

We have identified above a relationship between waste data availability and waste minimisation target setting. While Transpower supports the use of targets for waste reduction, it is not clear what the basis for the waste minimisation targets in the Waste Strategy is in each case. The OECD finding that Aotearoa sent 49% more waste to landfill per person than the OECD average looks to be a key factor for the waste minimisation targets. Likewise, the target sought by the Emission Reduction Plan from the Climate Change Commission to reduce waste-related biogenic methane emissions by 40% by 2035 is clearly the basis for the emissions reduction target (albeit the proposal target is aiming for 30% reduction by 2030).

The proposal gives no indication of how the proposed interventions and initiatives to reduce waste set out in the draft Waste Strategy, contribute to achieving the waste targets. We believe there should be a commitment to both reviewing and potentially revising the waste targets within the final Waste Strategy, as well as to develop a stronger indication of contribution of waste management initiatives to achieving the targets (as data improves). This is in-part suggested by the proposal to revise the draft Waste Strategy and develop and revise action and implementation plans. We support the proposal to make this a statutory requirement.

As regards the waste minimisation targets set by the draft Waste Strategy, it is currently not clear which targets would apply to Transpower as a State-Owned Enterprise. As currently drafted, the Waste Strategy requires 'businesses' to reduce waste disposal by 30-50%, and the 'public sector' to reduce waste generation by 30 to 50%. Clarity on which waste minimisation target applies to State Owned Enterprises would be useful.

Transpower also supports the proposed initiatives set out in the Waste Strategy to strengthen the requirements to establish a 'duty of care' in the waste sector. Although a duty of care approach acts largely towards the bottom of the waste hierarchy, given the scale of the waste generation issue across Aotearoa, we see such an approach as fundamental to successfully achieving the first phase of the Waste Strategy.



Transpower supports the expectation set out in the Waste Strategy that requires businesses to take more formal responsibility to avoid the potential impacts of end-of-life assets and materials. This includes requirements to establish:

- appropriate storage and handling to control potential emissions;
- waste separation to facilitate recycling; and
- checks that waste material transport and disposal by or on behalf of a business are undertaken as intended and in line with legal requirements.

Transpower supports the licencing of waste transportation, processing and disposal facility operators recommended by the draft Waste Strategy. Based on our experiences to date, such a licensing approach will provide an additional level of confidence to business in those operators. Licensing of waste practitioners will also act to ensure that the transfer of waste is undertaken as intended by businesses and that waste disposal facilities are properly able to control the potential environmental effects of the wastes disposed of.

We note that under Priority 5 (Reduce emissions from organic wastes), the Waste Strategy proposes to require waste minimisation plans as part of the consenting process for building and development projects. Transpower is currently progressing with 2 pilot projects implementing waste management methods to assess the usefulness of this as an approach to better manage wastes. We are happy to discuss our experience with these pilots with MfE staff as we complete the evaluation of the pilots in June 2022.

Response to consultation questions

We have responded only to questions where we have specific experience or interest.

Part 1: Why we need to transform our approach to waste

Question 2 - Do you support tackling our waste problems by moving towards a circular economy?

Transpower supports the longer-term goal of moving towards a circular economy, including refinement of product stewardship mechanisms.



Part 2: Proposed new waste strategy for Aotearoa New Zealand

Question 5 - Do you support the proposed approach of three broad stages between now and 2050, and the suggested timing and priorities for what to focus on at each stage?

Yes, and in particular bringing NZ to global standards as a goal for Phase 1.

Question 6 - Looking at the priorities and suggested headline actions for stage one, which do you think are the most important?

We see the priorities as investing in onshore processing and recycling capacity and legislation affecting a 'duty of care' as being the most important priorities for phase 1.

Question 7 - What else should we be doing in stage one?

It would be useful for the Waste Strategy to identify opportunities for the NZ government to influence international action and any plans to participate in that space.

We also recommend developing a database of waste infrastructure, including where waste infrastructure is available, and for what materials. This database would make it easier for waste generators to identify options to move materials up the waste hierarchy as described in the detailed submission above.

Part 3: Developing more comprehensive legislation on waste: issues and options

Embedding a long-term, strategic approach to reducing waste

Question 11 - Do you think new legislation should require the government to have a waste strategy and periodically update it?

We support the proposal to:

- revise the waste strategy;
- develop and revise action and implementation plans; and
- make these statutory requirements.

This proposal would ensure that the strategy reflected improving data on waste streams, allowing for targets to be refined and mechanisms for achieving them to be detailed, as described in the detailed submission above.



Putting responsibility at the heart of the new system

Question - 20 Do you see benefit in adapting the United Kingdom's duty-of-care model for Aotearoa New Zealand's waste legislation, supported by appropriate offences and penalties?

Yes, Transpower supports initiatives to strengthen requirements for a 'duty of care' in the waste sector. This strengthening would help to ensure that waste generators appropriately manage waste and through waste separation, facilitate the growth of the recycling market. We discuss these benefits in the detailed submission above.

Question 23 - Do you support a nationwide licensing regime for the waste sector?

Yes, Transpower supports a licensing regime for the waste sector. Licensing would give assurance to waste generators that waste operators transport and dispose of waste using appropriate environmental controls. We detail this issue in our detailed submission.

Question 24 - Should the new legislation include a power to require a tracing system to be developed for some or all types of waste?

Yes, Transpower supports a tracing system for waste. A tracing system would improve accountability for waste, and the improved waste data would enable development of more efficient policies and mechanisms to reduce waste.

Ensuring the waste levy is used to best effect

Question 37 - What should waste levy revenue be able to be spent on?

Transpower would support the use of the waste levy to include investing and co-funding waste infrastructure.

Contact for the submission

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