2021–2031 | Long-term Plan Consultation
This joint submission has been prepared by the group of zero waste advocates listed below. We are passionate about circular economy, eliminating waste and valuing resources; with this focus, responses have been prepared to Question 1, 4 and 7 in the Long-term Plan consultation document.

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Question 1 – Investment in three waters infrastructure

Which of these options do you prefer?

	Enhanced ($2.4b investment – the Council's preferred option)
	Maintain ($2.0b investment - lower rates and debt)
	Accelerated ($3.3b investment – higher rates and debt)
	None of these options
	Don't know

Question 4 – Te Atakura First to Zero (Climate Change)

Which of these options do you prefer?

	Fully fund the programme (Council's preferred option, $29.9m investment)
	Low level of funding ($18.1m investment, lower rates and debt)
	Medium investment with savings ($25.4m investment, lower rates and debt)
	None of these options
	Don't know

Question 7 – Reducing sewage sludge and waste

Sludge minimisation through alternate funding (Council's preferred option, $147m-$208m capital investment funded through a levy, no additional rates increase)
No change in current practice (no change to investment, rates or debt)
Invest in technology at Southern Landfill ($86m-$134m capital investment and additional 0.39% rates increase)
Sludge minimisation – through Council funding ($147m-$208m capital investment, above debt limit, and additional 1.65% rates increase)
None of these options
Don't know

Comments

Please note we have only responded to Question 1, 4 and 7 due to the remit of our group.

QUESTION 1

None of the options presented in the LTP have provided any major review or analysis of the resilience or sustainability of the three waters network as a whole. The enormous size, complexity and importance to a well-functioning city of three waters infrastructure requires its future to be very carefully considered. As highlighted by the work of Transition-HQ, the world is looking at a future where we will have no choice but to live more efficiently on less energy - big infrastructure depends on high energy inputs to run.

While we understand that historic underinvestment has left Council with little choice but to increase investment in critical upgrades and maintenance now, there is an enormous missed

opportunity to rethink the system for the genuine long-term (beyond ten years). Given the size of the infrastructure and the huge costs (expenditure, energy etc.) of running and maintaining it, we must begin to explore opportunities that consider how to better address the climate and local environmental impact of the system as it is now, while building more resilience and efficiency into our water systems. These opportunities can be developed through applying circular economy frameworks to the way we use, move, reuse and dispose of water.

We fully support the submission by the Poo Breakfast Club on the need to start exploring the feasibility of an alternative system for managing human waste/biosolids that does not rely on the wastewater system. Using water to transport biosolids increases the contamination of both the biosolids, and the water.

Instead, solids and wastewater should be kept separate (thus uncontaminated). In such a system, biosolids can be processed either at a local level or collected and processed at a centralised composting facility separate from the wastewater treatment plant. While this is a long-term issue, budget must be allocated now to investigate and help develop a source-separated wastewater/sanitation system, as it may take decades to phase in completely. We recommend some waste minimisation funding for organics goes towards pilot and feasibility studies for decentralised, source-separated sanitation systems.

The consultation supporting documents identify the following action "*Making investment in green infrastructure business as usual with mātauranga Māori guiding delivery where it is practicable in relation to the impacts of stormwater."* We recommend that tikanga should also guide delivery, and we recommend deleting the words 'where it is practicable'. The idea that tikanga Māori might not be considered for reasons of practicality is not itself, tika - all responses need to be informed and guided by mana whenua and tikanga Māori. It's not for Council to determine, but to ensure mana whenua are supported to guide.

Council must also consider smaller-scale initiatives that can improve environmental outcomes and reduce load on the infrastructure in the short-term. Such initiatives include:

- Prohibiting the disposal of food waste into the wastewater system in order to reduce pressure on the wastewater network and mitigate waste-related emissions. This would include banning new installations of waste disposal units in households (e.g. Insinkerator) and technologies that process commercial quantities of food waste to be disposed of in wastewater (e.g. ORCA and Iugis). Any existing systems should be phased out akin to the Climate Change Commission's proposed phase-out of gas connections.
- Installing litter traps at key stormwater outflow sites, in consultation with ecologists with relevant expertise (e.g. the pathways of migratory fish), could help reduce the incidence of plastic pollution in the marine environment and would also provide a good opportunity to collect data on litter concentrations and types.
- Alternative approaches that improve efficiency of water usage and retention must be considered as part of investment in the three waters infrastructure. For example, enhanced education, tools and incentives to encourage and, in some cases, require

water conservation activities; effective and strategic water metering; encourage, incentivise and ultimately require greywater recovery; invest in and implement sustainable urban drainage systems (SUDS). The Hutt City Long Term Plan Consultation acknowledges that reducing water consumption is vital for the region for environmental protection and fair distribution of water, and we support metering to provide information to help us understand water demand, find leaks and target water usage reduction activities.

QUESTION 4

We support the full funding of Te Atakura. However, we believe its scope is much too narrow. While energy use and transport are important, Wellington City's response to the climate and ecological emergency must be much broader, encompassing zero waste and circular economy frameworks, water use reductions, resilient urban redesign, biodiversity, and community resilience, among others.

It is particularly crucial that the transition to a zero-waste, circular economy is embedded in Te Atakura and its funded workstreams for the next ten years. We strongly support the Council investigating the inclusion of circular economy concepts into the Council's policy framework, as stated on p. 47 of Te Atakura, and encourage Council to go further and develop a full circular economy action plan as part of its core work on climate action. The transition to a circular economy presents one of our best opportunities for slashing Wellington's consumption-based emissions, as well as building in long-term resilience and creating employment.

We cannot overstate the importance of shifting to a circular economy as part of climate action. As much as 45% of global emissions are associated with making products, and circular economy strategies are needed to tackle these emissions. Furthermore, the recent *Circularity Gap* report outlines how simply reducing emissions in line with our Nationally Determined Contribution is not enough. Nationally Determined Contributions (NDCs) overwhelmingly focus on the energy transition and moving to non-fossil sources. Even if all NDCs are implemented, the rise in temperatures is still forecast to hit 3.2-degrees this century. By implementing a shift to a circular economy alongside meeting NDCs, global warming can be kept to 1.5 degrees.

We note the proposed workstream, under all proposed options, to measure Council and City greenhouse gas emissions and urge the council to include within this workstream a measurement approach that goes beyond the limited focus on production-based emissions. Taking only a production-based approach to measuring Wellington's emissions (let alone national and global emissions measurements) is a misleading representation of the climate impact of our city. It is crucial that the measurement of Council and City greenhouse gas emissions under Te Atakura incorporates consumption-based emissions and includes measurement of circularity. This will make the importance of a transition to a circular economy much clearer (for more detail on these points, see the Zero Waste Network's submission on the Climate Change Commission's draft advice here). Having this information inform Te Atakura's work and funding is critical.

While Te Atakura itself may not be able to stretch across all aspects of responding to the climate emergency, it should be well-connected with relevant Council-led initiatives, such as the Sustainable Food Network Action Plan, as well as community-led initiatives, to proactively avoid operating in a siloed manner. It is critical that the adaptation planning workstream of Te Atakura involves food and water security and resilience. The Wellington Climate Lab in particular presents a great opportunity to explore cross-sectoral, multiple-duty and paradigm-shifting solutions to the challenges our city faces.

We believe Te Atakura will have much greater success in achieving WCC's Priority Objectives 5 (an accelerating zero-carbon and wastefree transition) and 6 (strong partnerships with mana whenua) through formal integration of community input and advice into the work programme. We recommend that the delivery of Te Atakura involves community advisory panels/reference groups, e.g. for waste, emissions, circular economy, as there is substantial knowledge and skill in these areas in our community that can be drawn on (see also our response to Decision 7). Partnering with communities is also crucial for adaptation planning that will affect everyday people and businesses long into the future. Community partnership will help generate actions that are fit-for-purpose and well-accepted by Wellingtonians, and have long-term positive impacts.

Business and community funding provided through Te Atakura should be managed strategically to generate the most holistic, cost-effective outcomes possible. We believe the top-down funding approach results in a hodge-podge of siloed projects being funded. Te Atakura should facilitate and support collaboration between multiple sectors, including business, social enterprise, community organisations, mana whenua, and other stakeholders, in order to achieve greater impact and better outcomes per dollar spent of the limited funds available.

Having well-thought-out funding priorities and programmes will help amplify outcomes. For example, the Climate and Sustainability Fund should be made available to help advance circular economy models and initiatives, such as repair, reuse and sharing economies. We support the proposed workstream to provide support for car sharing and believe this support could be extended to provide support for the sharing economy more generally for a wider range of goods and services, from tools and clothes through to appliances and other goods. These could operate through peer-to-peer sharing platforms (such as Mutu), through community-run initiatives such as the Wellington Tool Library, or business models such as laundrettes. Formalising and expanding the sharing and service economy has been recognised as a key way in which high-income countries can reduce high levels of climate intensive material consumption.

Wellington has a fantastic opportunity to show leadership in the climate action space, both nationally and internationally, by placing the transition to a circular economy at the heart of climate action. WCC has a crucial role to signal and lead this transition, and facilitate and support collaboration.

QUESTION 7

We agree there is an urgent need for a solution that stops the need for sludge disposal at the Southern Landfill. We welcome the Council's commitment to addressing this issue urgently.

We fully support the submission by the Poo Breakfast Club on the need to start exploring the feasibility of an alternative system for managing wastewater and biosolids/human waste in the longer term that will build in true resilience. While this is a long-term issue, budget must be allocated now to investigate and help develop a source-separated wastewater and sanitation system, as it may take decades to phase in completely. We recommend that some of the waste minimisation funding earmarked for organics goes towards pilot and feasibility studies for decentralised, source-separated sanitation systems.

The current situation, requiring each tonne of sludge to be mixed with 4 tonnes of general waste for disposal, has been a significant barrier to Council action on waste minimisation. We have been repeatedly told that progress on waste diversion from landfill is dependent on removal or minimisation of the sludge. Now that a solution has been identified, we urge the Council to be ambitious and plan to avoid the need for future expansion of the landfill. Given the large investment of money to remove the sludge, the findings from the strategic review of waste, and the additional waste levy income, must be used to prepare and take action now rather than further delay.

We support the Council investing in the proposed infrastructure needed to reduce the amount of sludge that must be sent to landfill. However, we note that this is not a forever solution and is better understood as one that buys us the much-needed time to investigate, develop and build a more resilient and ecological, source-separated sanitation system that is ready to go before the ~50 year lifespan on the proposed infrastructure expires. We urge the Council not to continue kicking the can down the road on this issue, and to take the opportunity of time that the present infrastructural investment represents.

We note too the reference in the LTP to the potential that after sludge has been processed through the proposed infrastructure, that it could become "a product that could potentially be diverted from the landfill for beneficial re-use". We are concerned about this statement given the sludge will be contaminated with microplastics, heavy metals, persistent organic pollutants and other toxins as a result of being mixed with wastewater. We do not see a viable pathway for this sludge to be reused, safely. Again, the proposed infrastructure is not a long term solution to our sludge problems, it merely buys us time to develop a more resilient, source-separated system that will allow for safer beneficial reuse of the biosolids.

We urge the Council to involve the community in Waste Minimisation/zero waste beyond the formal consultation processes. One way this could be achieved would be by establishing a community advisory panel. For example, the recently established Waste Free Wellington group consists of individuals, organisations and businesses advocating and acting on zero waste in Wellington; there is substantial knowledge and capacity that can be drawn on. Community partnership will help generate actions that are fit-for-purpose and well-accepted by

Wellingtonians, and have long-term positive impact. This approach aligns with the Wellington Region Waste Management and Minimisation Plan (LM.6: Collaborate with private sector and community to work with local groups and waste companies).

Many of the groups who have come together to co-author this submission are part of the Waste Free Wellington group, which has three priority areas: community-scale composting; reuse economy; and building a resource recovery network. These priority areas align with actions already in the WRWMMP (for example, LM.3: Industry-based reuse). The group is supportive of the increase in landfill fees that will come in alongside the increase in the landfill levy and believe this can provide more funding for waste minimisation directed to developing solutions with business and the community.

We support Council plans to allocate more funding for organic waste diversion. The primary purpose of the organics fund should be to divert existing organic waste, particularly food scraps, not to support compostable packaging. Investment in packaging solutions are better aimed higher up the waste hierarchy - i.e. developing reusable packaging systems that have far more beneficial environmental and economic outcomes than single-use packaging systems (including compostables and recyclables). The uncertainties and risks associated with compostable packaging (including toxic chemical additives) should halt our use of such packaging until New Zealand has a much stronger regulatory and certification system for it.

We note that there is nothing explicitly in the LTP consultation about supporting the reuse economy beyond car sharing. Any funding should focus on the top of the waste hierarchy where there is the greatest potential to reduce waste. We are disappointed that work on the resource recovery centre is delayed until year 4; we know there is community appetite for more services in this area and opportunities coming through the Government's regulated product stewardship schemes (e-waste and potential container return scheme). There is the chance to work with the community now, to plan for further resource recovery capacity across the city and to implement this sooner. We are also disappointed about the lack of mention of construction and demolition waste, which makes up over 50% of waste going to landfill.

The current proposals are very centred on the waste that goes to the Council-managed Southern Landfill. The Council's waste minimisation focus needs to transcend that and consider waste generated by, and/or disposed within, the city as a whole. The new waste bylaw is a positive step and we look forward to seeing this being implemented and enforced, and appropriate Council funding allocated to enable this. Waste is a cross-cutting issue that should not be siloed in one department, otherwise the focus will remain on treating symptoms rather than turning off the tap and creating circular systems. The Council has the ability to lead and influence - particularly through procurement, funding and use of Council land - the creation of a circular Wellington. Waste is a climate issue far beyond the direct emissions from landfill, with nearly 50% of global carbon emissions being related to the consumption of products and materials. Focussing on a circular economy will reduce emissions, and bring additional co-benefits including job creation, resilience and community building.

See also our response to Decision 1 and 4.