



GLASS PACKAGING FORUM INC

**SUBMISSION TO THE MINISTRY FOR THE ENVIRONMENT ON
ENVIRONMENTAL REPORTING – A DISCUSSION DOCUMENT**

October 2011

Introduction

The Glass Packaging Forum (the Forum) comprises over 100 companies which produce or import, fill or sell glass containers in New Zealand. Member companies represent approximately 13% of NZ's GDP. Each participating company pays a levy based on the weight of glass containers which they make, fill or sell in New Zealand. This voluntary levy system forms the basis of a voluntary product stewardship scheme which received accreditation by the Minister for the Environment as meeting the criteria set out in the Waste Minimisation Act (2008).

The scope of the Glass Packaging Forum's Product stewardship scheme includes the funding of projects, research, infrastructure and educational programmes to increase the recycling and reuse of glass into either new glass containers or for alternative uses leading to a reduction in waste container glass to landfill. Improvements in the efficiency of the use of glass in packaging will be supported and promoted. The scheme also provides annual data on the mass balance of glass used, recovered and recycled as a percentage of that consumed in New Zealand.

The Forum has also been appointed Brand Manager of the Government's Love NZ brand and is managing a public place recycling programme funded by the Waste Minimisation Fund.

The Forum contributes to the provision of recycling data in the following ways:-

1. Collates and Reports data on glass consumed and recycled in New Zealand. See Figure 1 below.

2. As part of its project management of the Love NZ public place recycling programme is required to collate data from councils and organisations which have installed Love NZ recycling facilities and report total amount of packaging recovered to the Ministry for the Environment on an annual basis.

Figure 1: Glass Packaging Mass Balance Data

TONNES	2006	2007	2008	2009	2010	2011
PRODUCTION	128905	128110	131920	133779	125190	NA
CONSUMPTION	189005	208240	223200	229151	251664	241230
RECOVERY	92825	109860	138815	147201	166576	165178
%	49%	53%	62%	64%	66%	68.4%

The Forum's submission relates specifically to waste recovery data. It does not express views on environmental data relating to other resources e.g. water, air quality which are outside its remit.

Summary of Forum's Response to the Proposed Approach

- The Forum agrees that New Zealand should have legislation comparable with other OECD countries which require regular national reports on the state of its environment. It agrees that independent and robust validation of environmental data is necessary to assess the value of and to protect New Zealand's clean, green brand.
- The Forum supports a legislative change including an Environmental Reporting Bill for New Zealand.
- The Forum supports giving the Parliamentary Commissioner for the Environment an explicit role under the Environment Act 1986 but recommends the frequency of reporting on the state of the environment is three years.
- The Forum supports expanding regulation making powers under Section 360 of the Resource Management Act to improve the consistency of state of the environment monitoring statistics at local level.
- The Forum supports the need for local authorities to provide standardised data to monitor the same aspects of the environment in a consistent way.

Responses to Questions

Question 1: Do you agree with the issues identified above. Have the main issues been identified?

The Forum agrees that legislation is necessary to deliver consistent and robust data on waste management. It agrees that there need to be standard monitoring indicators, methodologies and monitoring.

Whilst responsibility for reporting under the RMA rests with regional councils, in practice territorial authorities that put in place waste management services are those that should provide the data on collection tonnages.

Question 2: Are there any other issues that have not been considered?

The most recent data relating to waste to landfill available from the Ministry for the Environment is 2007-2008 with a snapshot update in 2010. However using the solid waste audit data to identify particular problem areas specifically with regard to glass being placed in landfill is difficult if not impossible because each waste report is based on different criteria.

From industry's perspective, the Forum relies on its own data collection process to identify the glass mass balance data in New Zealand.

Legislation requiring territorial authorities to produce consistent data will allow industry (and Government) to recognise particular problem areas. The discussion document does not identify the benefits to industry which would result from this proposed legislation.

Question 3: What is the scale of the problem? Which is the bigger issue: the lack of statutory obligation requiring regular independent state of the environment reporting or inconsistent state of the environment monitoring?

The inconsistent or sometimes non-existent state of environment reporting is the bigger issue.

The Forum's experience with collating data on waste diverted from landfill shows that local authorities report data in different ways by volume or by weight; through one off waste audits or do not collate data at all.

Some local authorities such as New Plymouth have excellent reporting systems. It is our experience through the management of the Love NZ programme that council staff are looking for leadership on how best to report data.

Question 4: Do you agree with these objectives?

The Forum agrees that any preferred options should make it clear who is responsible for regular state of the environment reporting.

The Forum agrees that the role of state of the environment reporting is independent of Government which will deliver transparency and consistency outside of three year political terms.

The Forum agrees that high quality environmental statistics are necessary to underpin the state of the environment reporting and environmental policy making. At present environmental reporting on waste is sporadic and inconsistent which does not enable robust decision making.

Question 5: Do you agree with the assessment criteria?

Agree with the assessment criteria proposed in the discussion document

Question 6: Do you agree with the preferred options?

The Forum supports the proposed option to:

Amend the Environment Act to require the Parliamentary commissioner to produce a state of the environment report. It agrees that this will ensure that reporting is independent of the Government of the day. It supports the ongoing role of the Ministry in collecting and analysing data.

However from a frequency perspective the Forum suggests a three yearly review timed to review the government of the day's performance in a three year election cycle would best hold the Government to account.

The Forum supports the proposal to amend regulations making powers under the RMA to require local authorities to monitor the same aspects of the environment according to specified methodologies and monitoring sites.

Question 7: Is there an alternative option that has not been considered

No comment

Question 8: To what extent do the options address the identified problems?

No further comment

Question 9: Are you aware of any other costs and benefits of the options?

Refer answer question 2

Question 10: Do you have any comment about which option would deliver the highest level of net benefit?

No comment

Question 11: What are the pros and cons of the proposed Environment Act amendment?

Nothing to add

Question 12: Is five yearly reporting an appropriate timeframe?

The Forum suggests a three yearly review timed to review the government of the day's performance in a three year election cycle would best hold the Government to account.

Question 13: What do you think about the proposed environmental domains that PECE should report on?

There is no specific mention of waste and this needs to be clearly specified. Without understanding the total amount of waste by product type currently being processed, reduction targets cannot be set.

It would also be beneficial if territorial authorities report on the cost of landfill in their region which will enable a cost benefit analysis to be done of the benefit of diverting waste from landfill.

Question 14 Have we accurately reflected the high level costs and benefits arising from the proposals for an Environmental Reporting Bill?

Agree that data is required to put a monetary value on New Zealand's clean green image.

Local authorities are allocated funds from the Waste Minimisation Fund to manage waste minimisation and will therefore have funding available to collate this data.

Question 15: Can you identify any other high level costs and benefits?

No additional comments

Question 16: Do you have any information you would like to see included in the final cost- benefit analysis which will be carried out after the submissions are received and analysed?

No