

# **Determination Report:- Appropriateness of Bylaw Mechanism**

Waitakere City Council, North Shore City Council  
and Rodney District Council

Hill Young Cooper Ltd &  
Capital Strategy Ltd

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# 1 Executive Summary

## 1.1 Effective Waste Minimisation

Central government and local authorities have, for some time, been attempting to reduce the amount of waste committed to landfill. This has been driven both by the recognition that a significant proportion of waste is a resource capable of other uses, and also in the light of significant community resistance to the siting of new landfills and associated planning and resource management issues.

In 1996 central government amended the Local Government Act 1974 [the "LGA"] to make explicit provision for waste management planning, and in 2002 issued its New Zealand Waste Strategy [the "NZWS"] with key targets for waste minimisation [among other targets].

In the meantime Waitakere City, North Shore City and Rodney District councils have developed waste management plans and waste minimisation targets, and introduced operational bylaws. In the process these councils have identified some significant problems, particularly around the obtaining of reliable waste stream data on which to develop realistic minimisation targets and programmes. A consequence has been the decision to consider using the available bylaw mechanism under the LGA to provide both for a licensing regime to regulate waste collection and disposal and collect associated data, and potentially a waste levy to fund waste minimisation activities on the basis of targeted behaviour change. All bylaws carried over from the LGA 1974 [which includes the existing waste bylaws] must be reviewed by 1 July 2008.

## 1.2 A Bylaw?

Hill Young Cooper Ltd was commissioned to provide policy analysis and advice under the LGA 2002 regarding the two important section 155 determination requirements:

1. Whether a bylaw is the most appropriate way of addressing the perceived problem; and, if so,
2. What the most appropriate form of any such bylaw should be.

The following report addresses the first of these questions and concludes that a bylaw is the most appropriate way of providing the necessary financial and regulatory support for achieving the respective waste management plan minimisation targets and the broader objectives of the NZWS.

A second report will be provided in February 2005 that addresses the second of these questions if councils adopt the conclusion of this report. That subsequent report will consider in more detail justification and lawfulness issues surrounding the adoption of a bylaw to regulate waste by license and levy.



rather than reducing or removing the waste problem itself. The Strategy is based around 5 core policies:

1. A sound legislative basis for waste minimisation and management.
2. Efficient Pricing.
3. High environmental standards.
4. Adequate and accessible information.
5. Efficient use of materials.

The NZWS sets national targets for waste minimisation, organic waste and specific waste streams (see Appendix I). It also provides a framework for the long-term direction, programmes and actions that will help each council achieve the proposed objectives and targets set out in the strategy.

A 1996 amendment to the Local Government Act 1974 also supports the NZWS by giving territorial local authorities a duty to encourage efficient waste management and powers to develop and adopt a waste management plan, and to make bylaws and grants for waste management purposes. This amendment, Part XXXI – Refuse Collection and Disposal - of the 1974 LGA, was not repealed by the subsequent LGA 2002.

### 2.3.1 Local Government New Zealand Remit

North Shore City Council has submitted the following remit to Local Government New Zealand,

*"That Local Government New Zealand supports the implementation of the New Zealand Waste Strategy. Toward this aim:*

- *request central government to introduce extended producer responsibility legislation for special wastes, for example, used tyres and oil*
- *request Ministry of Transport to cease importation of used tyres*
- *request a ruling from the Commerce Commission that exempts local levies and associated legislation from restrictive trade violations. Including amendment to section 544 of the Local Government Act 2002 as outlined"*

This remit has been submitted as a result of councils' concerns about their inability to achieve their waste management goals. The remit seeks stronger central government leadership in regards to waste management through various legislative changes (see Appendix II).

## 2.4 Local Government Regulation of Waste

### 2.4.1 Current Council Bylaws

The use of bylaws to regulate waste is not a new method. Each of the councils already has a bylaw relating to the management of waste (see Appendix III); however issues relating to private waste collectors/operators are not addressed by these bylaws.

Waitakere has bylaw No 30 (1999) Refuse Placement and Collection; North Shore has North Shore City Bylaw 2000, Part 20: Refuse Collection; and Rodney has Chapter 13: Removal and Storage of Waste. The bylaws provide for the control of the storage, collection, and disposal of waste from a public place. Licensing and conditions for waste collections [i.e. for Waitakere City and Rodney District] include such matters as:

- (a) The types of vehicles to be employed in waste collection;
- (b) The hours during which and the days on which waste may be collected;
- (c) The payment of a bond by the consent holder to allow the Council to recover any costs it may incur as a result of a breach of the conditions of written consent by the consent holder;
- (d) The types of waste containers to be used and the information to be displayed on such containers;
- (e) The payment of a fee or fees by the consent holder to the Council;
- (f) A requirement to provide returns of information at monthly intervals setting out the quantities and types of waste collected under the consent by reference to how much, in volume or weight, of the total waste is household waste, trade waste, green waste and recyclables; and
- (g) A requirement to provide returns of information at monthly intervals setting out the source and destination of the waste collected and transported under the consent/license.

#### 2.4.2 Christchurch City Council

Christchurch City Council has recently adopted and implemented its Cleanfill Licensing Bylaw 2003. This bylaw requires all sites receiving cleanfill for disposal to be licensed by the Council, and conditions of the licence include certain requirements including:

- Payment of a levy fee by waste type - currently \$9 per cubic metre on specified construction and demolition materials (including materials from roading works).
- Cleanfill operators to collect levies on behalf of the Council.
- Cleanfill operators to collate data for the Council on volumes, source, composition.
- Site operators to be paid for collecting levies and providing data to the Council

Revenue collected from the levy is channelled into a separate waste minimisation fund. The current value of levies collected by the Council is \$4 million.

#### 2.4.3 Other New Zealand Councils

Currently no other territorial local authorities in New Zealand have introduced waste bylaws to fund waste minimisation under the Local Government Act 2002. There is known to be considerable interest in this present initiative, with many councils understood to be awaiting the outcome of this work before proceeding.

## 3 Waste Management Plans

### 3.1 Council Waste Management Plans and Waste Minimisation Strategies

Section 539 of the Local Government Act 1974 (LGA 1974) and Local Government Act 2002 (LGA 2002) requires territorial local authorities to develop, adopt and amend, from time to time, a Waste Management Plan. Section 538 of LGA 1974 states that local authorities have a duty to promote effective and efficient waste management in their district, and in doing so must have regard for the environmental and economic costs and benefits for the district, and ensure that the management of waste does not cause a nuisance or is injurious to health.

In developing their waste management plans councils are required to make provision for the collection and reduction, reuse, recycling, recovery, treatment, or disposal of waste within their district. Furthermore, the council's Waste Management Plan must provide for the effective and efficient implementation of the plan, and/or for activities considered appropriate for that purpose to be undertaken by, or under contract to, the territorial authority.

The waste management plan must incorporate the following hierarchy of disposal options, listed from most desirable to least desirable:

1. Reduction
2. Reuse
3. Recycling
4. Recovery
5. Residual disposal (including treatment)

The plans are also required to address the other matters raised in Part XXXI of the 1974 Act, including:

- the promotion of waste minimisation education (section 540);
- the provision of waste disposal facilities (section 541);
- the collection and transportation of waste (section 541);
- any waste management grants (section 543); and
- the allocation of costs (section 544).

It should be noted that councils must exercise their powers in relation to waste management in accordance with their waste management plans.

In addition to developing waste *management* plans, councils also have to develop waste *minimisation* plans. These latter plans set out the goals and objectives councils have set in regards to reducing the volume of waste going to landfill. Councils have incorporated their waste minimisation plans/objectives within their waste management plans, and have been developed in accordance with the NZWS discussed above.

## 3.2 Waitakere City Council

### 3.2.1 Background

The Council's Long Term Council Community Plan (2003) [the "LTCCP"] adopts a zero waste strategic platform. The vision of the zero waste strategic platform is:

*"Waitakere will be a clean and attractive city that turns all its waste into resources"*

However, the Council acknowledges that further analysis and review of waste pricing, cost recovery and the Council's funding policy is needed before any major advance in waste reduction can be made. The present work is part of that analysis.

### 3.2.2 Waste Management Plan (2003)

The goal of the Waste Management Plan is to achieve zero waste to landfill by 2020. The Plan is a short-term operational guideline of how the Council intends to manage the waste it generates, collects and receives at its Refuse and Recycling Transfer Station over the following three to five years. A more comprehensive review is anticipated before the end of 2005 to fully review pricing and other tools to take the city towards zero waste to landfill. The Plan notes that there is a lack of information about total waste generated and waste potentially shipped straight from industrial, retail and service sectors to landfill.

Over the next ten years the Council will:

1. Support the New Zealand Waste Strategy by advocating a waste management structure for New Zealand that will provide incentives for waste minimisation and disincentives for waste.
2. Work collaboratively and creatively towards a Zero Waste target.
3. Use and encourage best practice and innovative methods of waste management and waste reduction using the 5.R's hierarchy – reduce, reuse, recycle, recover and, as a last resort, residual to landfill.
4. Identify and develop local business and employment opportunities based on better resource use.
5. Help strengthen and enhance the economic, social and environmental performance of the recycling and re-manufacturing industries.
6. Manage the environmental impacts of all closed landfills and other contaminated sites that are the Council's responsibility, and develop a framework for management of privately owned contaminated sites.
7. Endeavour to be a good role model in the management of its own properties and services.

The Council will continue to provide ongoing services such as weekly refuse and recycling collections, annual inorganic collection and operation of the Resource Recovery Centre. In addition to these services, the Plan seeks new initiatives to achieve waste minimisation, including:

- Licensing of refuse and recycling collectors;

- Resource Recovery Centre for inorganic resources;
- Domestic kitchen waste collection for composting;
- Construction and demolition recycling from its own development projects;
- Encourage industry to separate construction and demolition material at source;
- Council monitoring and reporting of tonnages of household refuse and recycling collected by contractors each year.

The Plan addresses different waste streams and provides targets to be achieved within these. The Plan indicates that these targets are goal statements at this stage, rather than mandatory requirements. Some of the more relevant targets are identified in the following table.

Timeframe	Targets
By June 2004	<ul style="list-style-type: none"> <li>▪ establish a reuse park within the city</li> </ul>
By June 2005	<ul style="list-style-type: none"> <li>▪ volume per capita of litter, dumping and domestic waste (including inorganic waste but excluding kerbside recycling) generated from within the City and deposited at the transfer station will be less than 151kg per person, and less than 145kg by 2010.</li> <li>▪ Inorganic waste collected reduced to 29 kg or less per person as the reuse park begins to operate (from annual collection)</li> <li>▪ 55% of City's green waste and collected organic waste composted at transfer station</li> <li>▪ 100% of all compostable green waste at transfer station recycled</li> <li>▪ recyclable will constitute 45% of all kerbside collected refuse</li> <li>▪ domestic waste collected reduced to 114 kg or less per person through organic waste initiatives</li> <li>▪ 10% of all construction and demolition waste arriving at transfer station recycled</li> <li>▪ hazardous waste appropriately treated before disposal at licensed facilities</li> </ul>
By June 2006	<ul style="list-style-type: none"> <li>▪ develop second Resource Recovery Centre for schools where businesses can drop off waste that can be used by schools</li> </ul>
By June 2008	<ul style="list-style-type: none"> <li>▪ 70% of all construction and demolition waste arriving at a transfer station diverted for further use</li> </ul>

**Table 1 – Waitakere City Council Waste Minimisation Targets**

### 3.2.3 Progress to date

Targets for waste management are established each year through the Annual Plan process, and then reported on each year through the Annual Report process. The

Annual Report therefore demonstrates whether the Council is achieving the targets for waste minimisation.

In June 2003 the Council reported on the following targets:

- 140.4 kg per person volume per capita of litter, dumping and domestic waste was achieved (target = 152 kg per person or less);
- 22.5% of waste entering Transfer Station was diverted from landfill (target = 27% or more);
- Domestic waste collected was reduced to 115.4 kg per person (target = 115kg per person or less);
- Inorganic waste deposited at the Transfer Station reduced to 20.9 kg per person (target = 31 kg or less);
- 50.8% of green waste recycled or composted at Transfer Station (target = 50% or more)
- 11.1% of waste recovered (target = 15% or more)

In 2003 the Council achieved three of the above targets, while three of these were not achieved.

### 3.3 North Shore City Council

#### 3.3.1 Waste Minimisation Plan (August 2001)

The Waste Minimisation Plan is a waste management plan in terms of the LGA. The plan primarily addresses solid waste, rather than liquid or gaseous waste. Vision:

*"The city, including residents, businesses and the council, will take responsibility for the waste it produces and work to reduce it, enhancing the environment in which we live, work and play."*

The only target set in this plan is that "we will reduce the quantity of waste disposed of to landfill by five per cent (of 1997 levels) per annum, with our ultimate goal to be zero waste to landfill." Waste quantities are measured by weight, and the target is irrespective of population growth. Actions are then identified within each waste stream to demonstrate how waste will be minimised. These actions flag a list of potential initiatives that could be used to reduce waste to landfill.

The Council intends to continue providing households with an annual inorganic collection and weekly refuse and recycling collection, and using private landfills for disposal. There is no intention to become involved in building disposal facilities, although the council indicates support for the establishment of reuse and recovery facilities. In addition, the Council seeks to lead by example by improving internal operations to ensure waste reduction.

Waste Stream	Actions
Household Inorganic	▪ investigate options for recycling inorganic waste
Household refuse	▪ introduce licensing of all refuse and recycling

Waste Stream	Actions
and recycling	<ul style="list-style-type: none"> <li>collectors</li> <li>▪ review refuse bylaw and policies to meet aims of plan</li> <li>▪ work on providing access to recycling for multi-resident complexes</li> <li>▪ introduce economic disincentives on use of large refuse containers</li> </ul>
Organic Waste	<ul style="list-style-type: none"> <li>▪ implement organic waste recovery strategy</li> <li>▪ subsidise compost bins and/or green waste collection and disposal to residents</li> </ul>
Hazardous waste	<ul style="list-style-type: none"> <li>▪ implement Auckland Region Hazardous Waste Programme</li> <li>▪ offer mobile collections for household hazardous waste</li> </ul>
Business waste	<ul style="list-style-type: none"> <li>▪ review provision of household refuse and recycling to commercial shopping centres</li> <li>▪ work with business to implement cleaner production and waste reduction programmes</li> </ul>
Disposal of waste	<ul style="list-style-type: none"> <li>▪ consider alternative technologies</li> </ul>
Public education	<ul style="list-style-type: none"> <li>▪ adopt a public education strategy</li> </ul>

**Table 2 – North Shore City Council Waste Minimisation Actions**

### 3.3.2 Progress to date

In June 2004 the following achievements were reported in the Annual Report:

- Over 20,000 tonnes of recycling collected for 2003/04 (increased);
- Waste and participation analysis indicates that 93% of single family households are regularly recycling and rubbish outputs are decreasing slightly;
- Launched several new programmes for waste reduction as per the Waste Minimisation Plan.

The Annual Report does not identify whether the Council has met the cumulative target of 5% waste reduction, but measures success by the satisfaction of residents and businesses with the services provided.

## 3.4 Rodney District Council

### 3.4.1 Zero Waste Plan (July 2002)

The Rodney District Council waste management plan sets out a vision of working towards zero waste to landfill by 2020. Vision:

*"Our vision is to protect Rodney's special environment by working to reduce waste with the aim of Zero Waste to landfill by 2020."*

The plan proposes to achieve this vision through a series of coordinated actions carried out in the various waste streams. A total of 50 initiatives, identified and prioritised by the council, could be implemented to assist council in achieving this vision over the next 18 years.

The plan sets out 5 key action areas to ensure a balanced programme to successfully bring about long-term progress towards zero waste. Actions need to occur within each of these areas as they are mutually supportive in the process of gradual change. The division into these key areas helps order the zero waste initiatives and clarify their purpose.

Action Area	Description	Examples
Take Direct Action	Initiatives that deal directly with the waste stream (17 initiatives)	<ul style="list-style-type: none"> <li>▪ kerbside collection</li> <li>▪ compost operations</li> <li>▪ cleaner production</li> <li>▪ recycling facilities</li> </ul>
Change the Rules	Legal and economic incentives and disincentives that will divert activity from disposal toward reduction (14 initiatives)	<ul style="list-style-type: none"> <li>▪ Extended producer responsibility</li> <li>▪ Landfill bans</li> <li>▪ Landfill levy</li> <li>▪ Purchasing policies</li> <li>▪ Polluter pays</li> </ul>
Foster New Ideas	Creation of structures and mechanisms to nurture the development and testing of new social, technical and economic solutions (5 initiatives)	<ul style="list-style-type: none"> <li>▪ Research &amp; development</li> <li>▪ Pilot schemes</li> <li>▪ Awards</li> <li>▪ Educational courses</li> </ul>
Communicate and Educate	Actions that inform the community of the issues and provide opportunity for input and participation (8 initiatives)	<ul style="list-style-type: none"> <li>▪ By recycled campaign</li> <li>▪ Festivals and events</li> <li>▪ Public consultation</li> <li>▪ Education</li> </ul>
Monitor and Feedback	Gathering data & information on characteristics of waste streams and success of initiatives (6 initiatives)	<ul style="list-style-type: none"> <li>▪ Waste analysis data</li> <li>▪ Participation rate surveys</li> <li>▪ Interim goals</li> <li>▪ Waste operator licensing &amp; reporting</li> </ul>

**Table 3 – Rodney District Council Waste Minimisation Actions**

The Plan quantifies the proportion of each waste stream, and suggests that if all the initiatives were implemented in combination waste to landfill could be reduced by up to 54% in the first 3 years (by June 2005). The following table identifies the components of this reduction:

Waste Stream	Current proportion	Reduction Targets by June 2005
Residential Inorganic	42%	Reduce by up to 23%
Residential Organic	21%	Reduce by up to 14%
Commercial Inorganic	27%	Reduce by up to 12%
Commercial Organic	2%	Reduce by up to 1.5%
Hazardous and Special	8%	Reduce by up to 4%
Totals	100%	54%

**Table 4 – Rodney District Council Waste Streams**

### 3.4.2 Progress to date

In June 2003 the following achievements were reported in the Annual Report:

- 30,776 tonnes of waste went to landfill (target = 29,058 tonnes)
- 4,385 tonnes recycling (no target set)

The Annual Report merely identifies the tonnage of waste to landfill and the tonnage of recycling. There is no direct reporting of how the initiatives of the Zero Waste Plan have been achieved. However, looking at the figures provided it does not appear likely that the Council would be able to achieve a 54% reduction by June 2005 by the current methods.

### 3.5 Conclusion

An assessment of each of the councils' waste management plans and waste minimisation strategies demonstrates whether the targets set are being met by current mechanisms. Although specific targets for waste minimisation are not set for each council, each identify a goal of zero waste to landfill and a number of initiatives to achieve this.

- Waitakere City Council is achieving some of its targets but is not meeting key targets of diverting waste entering the Transfer Station, reduction in domestic waste per person, or recovery of waste;
- North Shore City Council is unable to determine whether the target is being met as it does not have sufficient and reliable information; and
- Rodney District Council is not achieving the level of reduction in each waste stream anticipated as not all initiatives proposed in the Zero Waste Plan have been successfully implemented.

In conclusion, each council is unable to achieve the goal of zero waste to landfill and report the need for additional mechanisms to provide information, funding and incentives to reduce waste.

## 4 Consultation

### 4.1 Views of the Industry

Initial informal consultation on the concept of a licensing and levy regime has been carried out with key industry waste groups. This took the form of a workshop in November 2004 facilitated by the Ministry for the Environment. Industry comments are being considered by Council officers and a further workshop is proposed in the near future to respond with more in-depth information on the licensing requirements and address issues of concern such as:

- Enforcement;
- The necessity of a waste levy; and the
- Implications for industry of implementing a licensing system and a waste levy.

The workshop attendees agreed that the main requirements of a licensing and levy regime were:

- Practicality;
- Fit for purpose;
- Provision of useful information;
- Need for consistency of any system;
- Fair allocation of funds raised for waste minimisation projects; and
- Common opportunity.

### 4.2 Views of the Waste Generators

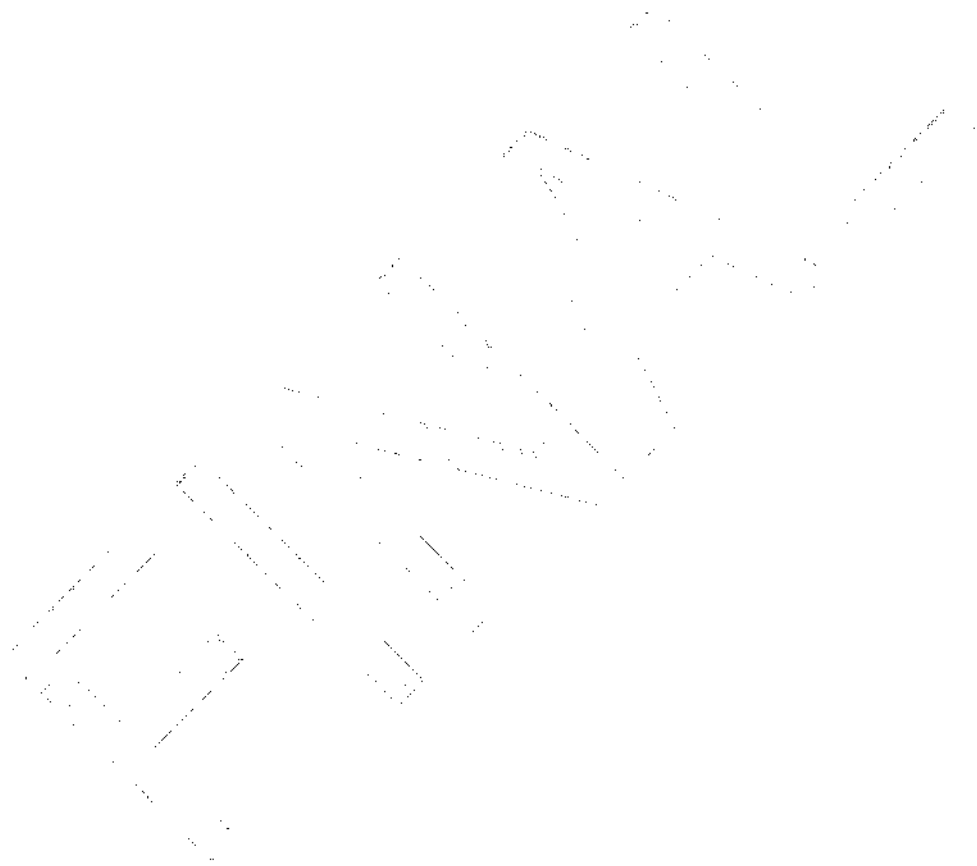
The broader community's views have previously been canvassed through the process leading up to the adoption by councils of various management plans, including waste management plans, annual plans and the LTCCPs. Feedback received from councils has indicated that the public generally supports a targeted user pays approach for waste management.

To date there has been no specific consultation with commercial waste generators.

### 4.3 Views of iwi

No consultation has been specifically undertaken to date with iwi on the proposed bylaw. However, the councils have previously consulted with various relevant iwi groups over the development of their management plans, including their waste management plans, annual plans and LTCCPs. As noted earlier these various

documents have signalled councils' intent to look at bylaw options. Furthermore it is anticipated that iwi will be consulted during the next stage.



## 5 Problem Definition

### 5.1 Waste Minimisation Information

Within the territorial area covered by the three councils, there are:

- multiple waste streams,
- handled by numerous contractors, and
- disposed of at various sites both within and outside of the area.

Waste is collected under arrangement by a range of public and private service contractors, from both public and private properties. Once collected the waste is either reused, recycled, recovered for use elsewhere, or disposed of at: transfer stations within the area; transfer stations outside of the area; or transferred to landfills outside of the area.

#### 5.1.1 Lack of consistent and robust waste data

As the three councils have contracted out most elements of waste management within their districts, they are reliant on private contractors to undertake council collection, transportation and disposal services. Information is thus limited to that which is supplied by the contractors.

Whilst council contractors provide some information on waste streams, the existence of private waste collection, transportation and disposal services across the three local authorities means that information on these waste streams is unaccounted for.

Consequently councils have insufficient detailed information on the overall waste streams on which to make regulatory policy, and have had to rely on best-guess estimates. This lack of information limits the councils' ability to satisfy their statutory requirement to monitor waste flows and to achieve waste minimisations objectives.

#### 5.1.2 Obtaining data from contractors

Council contractors are currently required to provide the councils with information on the waste stream they collect under contract to the councils. This provides the councils with reasonably accurate information on the household waste stream from domestic and businesses. However this is only part of the total waste stream. Some contractors have indicated that they would be willing to provide council with the data on other waste streams if requested. However, based on past experience council officers have indicated that this is unlikely to happen in practice due either to the commercially sensitive nature of these data, or because the contractors themselves do not collect sufficient data to meet councils needs.

#### 5.1.3 Realistic targets

To implement their waste minimisation objectives the councils require detailed information about all waste streams, if it is reused, recycled, recovered or disposal method. Understanding the individual waste streams, and the various movements of

waste within these streams, allows the councils to develop an understanding of the bigger picture through which they can address both the overall waste issue as well as individual waste streams.

Over the past 10 years there have been a number of national and local initiatives aimed at improving the collection and aggregation of waste data. While some gains have been made, the data sets are still limited to snapshots of waste disposal quantities or composition at given points in times, and there has been little progress in producing a comprehensive and continuous system for collecting and collating waste data. Councils have had to rely on these partial 'snap-shots' to extrapolate both current and future projections of volumes, estimating targets within each waste stream.

Lack of any significant progress in this area was a key catalyst for including specific targets and a dedicated programme relating to improving information collection and communication within the NZWS. The scope of this programme includes the spectrum of solid, liquid and gaseous wastes, and the targets provide a focus on improving the collection of information from specific waste streams - e.g. municipal and industrial wastewater, green wastes, construction and demolition wastes and general municipal solid waste.

Quality information (i.e. "fit for purpose") is critical to sound monitoring and decision-making of waste minimisation. Better information is required to understand the different waste stream profiles and to encourage the transfer of waste from landfill by reuse, recovery and recycling. Furthermore, by understanding the source of the waste stream councils can begin to address the problem of waste production, rather than dealing always with "end of pipe" solutions. This level of information is essential to better understand the issues and opportunities, and thereby support policy decision-making and monitoring the effectiveness of waste initiatives and the NZWS.

While many waste operators monitor and collect information for their own purposes, the ability to 'regionalise' or nationalise the data is limited by the varying details and systems involved. Therefore, data needs to be of a form that can be logically combined to provide district, regional and national data sets, and be sufficiently consistent over time to illustrate trends in waste streams.

## **5.2 Existing funding and ability to meet waste minimisation objectives**

Specific targets are included in the NZWS which can only be implemented through improved service provision which, in turn, requires additional resources as noted below. Under the NZWS, waste minimisation is to be achieved through specific targets for organic wastes, special wastes, and construction and demolition wastes, in addition to specific targets for hazardous wastes. The NZWS also refers to efficient pricing to ensure that, as far as practicable, pricing reflects the full costs of waste disposal.

Each of the three councils' range of waste management services and waste minimisation programmes are funded by a combination of rates (general and/or targeted such as a Uniform Annual Charge) and user charges.

The lack of information held by councils has flow-on effects on the councils' ability to meet their waste minimisation objectives as they are unable to accurately monitor and review the appropriateness of their waste minimisation initiatives. Limited information on the size and nature of the different waste streams hinders the councils' ability to monitor or develop further initiatives.

