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### **Public Health Review of Auckland's Waster Assessment 2023**

Tena koe Alex

1. Thank you for sending Auckland Council's *Waste Assessment 2023* to the National Public Health Service (NPHS), Northern Region for public health feedback, as part of the development of the Council's next Waste Management and Minimisation Plan (WMMP).
2. Consultation with the Medical Officer of Health on a council's waste assessment is required under the Waste Minimisation Act 2008. The scope of the consultation relates to the role of the Medical Officer of Health. This feedback was prepared by the Environmental Health team and medical officer of health at NPHS-Northern Region. The purpose is to highlight issues of public health and community wellbeing covered in the Assessment, rather than provide a detailed analysis. The Auckland Regional Public Health Service provided feedback on the council's previous waste assessments.

### **Context**

3. Both the NPHS-Northern Region and Auckland Council have a general function under the Health Act of improving, promoting, and protecting public health. This is relevant for waste minimisation and management, since there is potential for harm to public health and community wellbeing, for example, through exposure to chemical and biological hazards and discharges, infectious disease risk from decomposition, pest insects and rodents, and from the location and operation of waste-related facilities. NPHS and council environmental health services also have specific functions in relation to landfills, statutory nuisances and some types of businesses which produced offensive and hazardous waste.
4. Waste prevention, minimisation and management have implications for community wellbeing and public health through the whole of the production, distribution, marketing, retail, consumption, reuse, recycling, resource recovery and disposal processes. There are also complex societal issues related to psychosocial wellbeing and consumerism which are outside the current scope.
5. Auckland Council's *Waste Assessment 2023* provides an extensive compilation and analysis of information of the current state, concerns and trends in waste-related issues

in the region, and the national and regional strategic and policy issues and priorities. It describes the complexities and inter-related aspects of production, use, reuse and waste very well, and will be a useful resource for progressing waste minimisation and improving waste management in the region.

6. The region faces considerable environmental, social and economic challenges, including demography, health and social inequalities, housing shortages, climate instability, environmental deterioration (as documented by the Council and Statistics NZ), resource constraints, and economic activities which depend on externalising environmental harm. These challenges are part of the context for the next WMMP.
7. NPHS-Northern Region is overall supportive of the proposed vision, principles, goals and objectives of aspiring to zero waste to landfill by 2040, building a circular economy and taking care of people and the environment, while recognising this will be challenging. Adopting “Option 2” in the next Waste Minimisation and Management Plan would be a significant enhancement.

## **Legislation and Strategic context (Section 2)**

8. The changes in national and regional strategy, policy and regulation on waste minimisation since 2017 and Auckland Council’s responses listed in the 2023 Waste Assessment are intended to contribute to waste reduction and improved waste management, hence enhancing community wellbeing and public health.
9. Strategic and policy developments of note include the updated Waste Strategy (including its support for circular economies); increase in the Waste Disposal Levy; phasing out of several single use and hard-to-recycle plastic products; progress on product stewardship; the Council’s Waste Management and Minimisation Bylaw; and implementation of kerb-side food scraps collection.
10. Further changes in national and regional policy, legislation and strategy are in process. The NPHS is involved in the Ministry for the Environment’s development of the Waste Action and Investment Plan.
11. Ensuring that population and public health, environmental health and community wellbeing are integrated into national and regional policies, plans and services is important for the National Public Health Service. Some relevant issues for waste minimisation and management include:
  - Shared roles and responsibilities of NPHS and councils to improve, promote and protect public health;
  - The application of Te Tiriti o Waitangi, as part of the strategic context for the council’s WMMP, as well as for Pae Ora (Healthy Futures) for Te Whatu Ora - NPHS;
  - Promoting equity and seeking environmental health justice. Facilities which produce and process waste are commonly located in or near areas of socio-economic

disadvantage. This can increase the risk of exposure to hazardous discharges and lessen amenity. Council planning and resource consent processes need to avoid creating or exacerbating community disadvantage; and

- Considering climate change mitigation and adaptation, and just transitions.

### **Progress since 2018 (Section 3)**

12. We acknowledge that the council has limited direct influence over waste management in the region, and limited ability to collect information on the quantities and type of waste generated and disposed of. While the Waste Assessment outlines the significant progress since 2018 on legislation, policy, local services and programmes, it does raise concerns about the overall rise (30%) in per capita disposal to landfill. This is largely attributed to commercial, construction and demolition waste, while domestic waste has decreased somewhat.
13. Progress on national and regional initiatives described in the Assessment is encouraging, such as the increased waste levy, national container return scheme, initiatives with the demolition and construction industries; community recycling; kerbside food waste collection; and partnerships. The Council's progress on its in-house waste shows what can be done by organisations which tackle the issue systematically.
14. Progress will need further change in central and local government policy, regulation, information collection and analysis, and an ability to influence and coordinate action across all the sectors involved.

### **The “Waste Problem” (Section 4)**

15. The particular points of public health interest include:
  - Trends in the quantity, composition and sources of waste
  - Trends in greenhouse gas emissions from landfills, and their management
  - The extension and development of the Resource Recovery Network and Community Recycling Centres, and encouragement for repair.
  - The roll-out of product stewardship schemes for high priority waste streams
  - Waste from disasters
  - Management of hazardous waste
  - Management of asbestos-containing waste material
  - Management of electronic waste
16. We will be interested in progress on the domestic food scraps collection. That the material is transported over 200 km to Reporoa for processing indicates a lack of appropriate facilities in or near the region. Will Auckland Council seek to increase the proportion of this material processed closer to its source? The Council needs to be satisfied that the processors have sufficient capacity as the volumes increase.

17. Of particular concern is the increasing problem of disposable (non-degradable) nappies and related products, which should be a priority for addressing once the kerbside food scrap collection is implemented. Section 8.2.4 in the Assessment describes the situation and potential strategies well. While the council has limited influence over the production, import and sale of these items, other strategies to reduce their volume and environmental health impact become more important, such as national level actions (eg through regulation and financial instruments), promotion of biodegradable products (eg through procurement policies for relevant sectors), development of local collection services (eg from childcare facilities and residential care facilities), and local processing facilities (eg as outlined in s 8.2.4).
18. NPHS-Northern Region has a long-term concern about management of scrap metal, especially following a series of serious fires in scrap metal yards which resulted in extensive plumes of toxic smoke. While the Council is not directly involved in managing these facilities, it does have influence through resource consent conditions, HSNO controls, and links with FENZ, Worksafe, facility operators and other agencies.
19. The situation concerning hazardous waste is of concern, considering the fragmented national and regional framework for managing hazardous wastes, and limited information which agencies are able to obtain. NPHS-Northern Region would support Auckland Council's advocacy for improvement of national policy, regulation and resourcing.
20. Asbestos is another waste stream which can be expected to continue to be problematic, because of demolition and construction, the expense of disposal and limited facilities accepting it. Council's Environmental Health services, Building Services, NPHS-Northern and Worksafe have been involved in asbestos-related incidents such as fires and unauthorised disposal, and have been developing inter-agency procedures.
21. Health services are a significant contribution to waste, including general waste; medical-related waste (including unused pharmaceuticals as noted in section 5.6), contaminated and infectious waste; and hazardous medical waste. The COVID-19 pandemic response has increased the volume of waste such as single use PPE, which is likely to be on-going. Projects have been developed to address different aspects of procurement, use, waste separation, waste minimisation, recycling and disposal. Some, such as phasing out polystyrene cups, are discrete and achievable, whereas others such as single use sterile plastic surgical equipment require extensive redesign of equipment and processes. Te Whatu Ora has a dedicated sustainable health service group. The links between Council and Te Whatu Ora services in the Auckland region on health service waste minimisation and management can be developed further.

### **Services and Facilities (Section 5)**

22. The topics in this section of particular public health interest include:
  - Community engagement and education

- Waste services in public places
  - The operation of refuse transfer stations and landfills
  - Hazardous waste management
  - Implementation of the food scraps kerbside collection, and subsequent processing
  - Management of electronic waste because of potential discharge of toxic materials
23. We recognise the limitations and challenges with disposal facilities and transfer stations, their capacity, longevity, siting and management, as well as the limited information available from commercial operators to Auckland Council.
24. Complaints to NPHS-Northern Region about waste collection and landfill management are uncommon, and are generally referred to the Council's environmental health service.
25. Waste to energy: in general NPHS-Northern Region remains opposed to municipal waste incineration because of contaminants such as heavy metals and dioxins, and the operational challenges posed by the mix of materials present in municipal waste.
26. The question of productive use of biosolids from wastewater treatment plants is raised periodically. Since there is limited separation of trade waste and other contaminant sources in Auckland, contaminant levels in biosolids remain problematic.
27. Closed landfills: Section 5.4.3 outlines the closed landfill situation briefly. These raise public health concerns, from potential exposure to leachate, the presence of old hazardous industrial and agricultural chemicals, methane production and risk of damage from flooding, sea level rise and coastal erosion. Notable is the recent situation on the West Coast where storm flooding exposed a substantial landfill, causing widespread contamination. We are aware of closed landfills which have had to be dug out because of leaching and erosion. Council's Engineering and Technical Services need to have the funding and capability to manage these over the long term.

### **Future demand (Section 6)**

28. Section 6 on future demand presents a very useful analysis of the complex interacting factors affecting future material flows and waste management, including demographics, the dynamics of the construction and commercial sectors, and changing patterns of household purchasing and consumption.
29. Increasingly complicated manufacturing, for example, can make separation of materials impracticable locally unless products are designed for disassembly into recoverable and recyclable components. While there has been substantial efficiency improvements in material use in many manufacturing processes, there has, unfortunately, been limited "decoupling" of materials use and energy consumption from overall production. The extent of "uneconomic growth", where production causes more environmental and social harm (including waste) than societal benefit, should be a consideration for the new WMMP. The increasing gap between projected waste to landfill and the current WMMP

target of zero waste to landfill is of concern, hence the importance of working with industry and communities; and advocating for regulatory and policy change.

30. The projections for increased volumes of many waste types, especially construction waste and plastics, is of concern. The Waste Assessment highlights ways construction waste could be prevented and reduced, by better design and construction methods. This is relevant to the major infrastructure projects planned, including future hospital construction by Te Whatu Ora.

### **Future Planning and Options (Sections 7-9)**

31. These sections provide a valuable description and analysis of ways forward for the Auckland region on its resource use and waste minimisation.
32. Waste minimisation and management is an escalating global challenge. A combination of effective regulation, commercial innovation and community and household actions is needed. Auckland Council should be involved in developing innovative methods in conjunction with research organisations and companies. How other cities and countries are approaching waste issues similar to Auckland's should provide examples of innovation applicable here.
33. We would like to see an emphasis on ensuring environmental health justice for local communities in the location and operation of facilities where waste is generated, stored, processed, recovered, recycled, and disposed of. There is potential for environmental and community health gain from using environmental and planning regulation in favour of disadvantaged communities.
34. There should be potential for greater environmental health gain from shifting responsibilities and costs towards those who generate waste (manufacturers, importers, retailers, marketers) rather than emphasising "consumer responsibility", since consumers often have little influence over factors like waste during production and packaging.
35. NPHS-Northern looks forward to continuing links with Auckland Council on the WMMP.

Nga mihi

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