

Bylaw Hearings Panel
Draft Waste Management and Minimisation Bylaw
2023
AGENDA

Notice of Meeting:

A Bylaw Hearings Panel meeting will be held on:

Date: Thursday 17 August 2023
Time: 9 am
Venue: Committee Room 2, Level 2, Civic Offices,
53 Hereford Street, Christchurch

Panel

Members
Councillor Victoria Henstock
Councillor Jake McLellan
Councillor Mark Peters

9 August 2023

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What is important to us?

Our Strategic Framework is a big picture view of what the Council is aiming to achieve for our community

Our focus this Council term 2022–2025

Strategic Priorities



Be an **inclusive and equitable city** which puts **people at the centre** of developing our city and district, prioritising wellbeing, accessibility and connection.



Champion Ōtautahi-Christchurch and collaborate to build our role as a leading New Zealand city.



Build trust and confidence in the Council through meaningful partnerships and communication, listening to and working with residents.

Adopted by the Council on 5 April 2023



Reduce emissions as a Council and as a city, and invest in **adaptation and resilience**, leading a city-wide response to climate change while protecting our indigenous biodiversity, water bodies and tree canopy.



Manage ratepayers' money wisely, delivering quality core services to the whole community and addressing the issues that are important to our residents.



Actively balance the needs of **today's residents** with the **needs of future generations**, with the aim of leaving no one behind.

Our goals for this Long Term Plan 2024–2034

Draft Community Outcomes



Collaborative and confident

Our residents have the opportunity to actively participate in community and city life, have a strong sense of belonging and identity, and feel safe.



Green and liveable

Our neighbourhoods and communities are accessible and well connected, supporting our goals to reduce emissions, build climate resilience and protect and regenerate the environment, especially our biodiversity, water bodies and tree canopy.

To be adopted by the Council as part of the Long Term Plan 2024–2034



A cultural powerhouse

Our diverse communities are supported to understand and protect their heritage, pursue their arts, cultural and sporting interests, and contribute to making our city a creative, cultural and events 'powerhouse'.



Thriving and prosperous

Our city is a great place for people, business and investment where we can all grow our potential, where enterprises are innovative and smart, and where together we raise productivity and reduce emissions.

Our intergenerational vision

A place of opportunity for all.

Open to new ideas, new people,
new investment and new ways
of doing things – a place where
anything is possible.



Ngāi Tahu has rangatiratanga over its takiwā – the Council is committed to partnering with Ngāi Tahu to achieve meaningful outcomes that benefit the whole community

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1. Apologies Ngā Whakapāha

At the close of the agenda no apologies had been received.

2. Election of a Chairperson Te Whakatū Poumua

At the start of the meeting a Chairperson will be elected.

3. Declarations of Interest Ngā Whakapuaki Aronga

Members are reminded of the need to be vigilant and to stand aside from decision making when a conflict arises between their role as an elected representative and any private or other external interest they might have.

4. Submissions on the Proposed Waste Management and Minimisation Bylaw

Reference / Te Tohutoro: 23/249957

Report of / Te Pou Ruth Littlewood, Senior Policy Analyst

Matua: Melanie Hayman, Contract Supervisor, Resource Recovery

General Manager /
Pouwhakarae: Lynn McClelland, Assistant Chief Executive Strategic Policy and Performance (lynn.mcclelland@ccc.govt.nz)

1. Nature of Decision or Issue and Report Origin

- 1.1 The purpose of this report is to summarise the submissions received during consultation on the proposed Waste Management and Minimisation Bylaw 2023. The proposed Bylaw will replace the current Waste Management Bylaw 2009, and Cleanfill and Waste Handling Bylaw 2015.
- 1.2 This report is intended to support the Hearings Panel in its deliberations on submissions.
- 1.3 The decisions in this report are of low significance in relation to the Christchurch City Council's Significance and Engagement Policy. The level of significance was determined on the basis that this report only contains information on the submissions and options for amendments to the bylaw for consideration of the Hearings Panel. The panel's role is to consider all submissions and to make recommendations to the Council on decisions on the proposed replacement bylaw and terms and conditions.

2. Officer Recommendations Ngā Tūtohu

That the Bylaw Hearings Panel:

1. Receive this report including attachments to support the hearings and deliberation process.

3. Detail Te Whakamahuki

Background

- 3.1 On 14 December 2022, the Council considered and approved the draft Waste Management and Minimisation Bylaw and Terms and Conditions for consultation.
- 3.2 The proposed draft bylaw integrates two current bylaws: the Waste Management Bylaw 2009 which provides the rules for the Council's waste management services and some other waste related matters and the Cleanfill and Waste Handling Bylaw 2015 relating to commercial waste handling operations, including 'clean' landfill operations.

Statutory power to make bylaws

- 3.3 The proposed bylaw is made under the bylaw making provisions of section 56 of the Waste Minimisation Act 2008, section 64 of the Health Act 1956, section 12 of the Litter Act 1979 and sections 145 and 146 of the Local Government Act 2002. The Local Government Act 2002 (LGA) also sets out the process, considerations and requirements for making a new bylaw or, as in this case, making a replacement bylaw.
- 3.4 In terms of section 155 of the LGA, the Council, is required to determine that a bylaw is the most appropriate way to address the identified problems and that the bylaw is in the most

appropriate form. In addition, the Council must consider whether the bylaw gives rise to any implications under the New Zealand Bill of Rights Act 1990.

4. Details Ngā mariu ā-Hāpori

- 4.1 Consultation on the draft bylaw opened from 30 January to 26 February 2023.
- 4.2 Consultation information was made available on the Council's 'Have Your Say' website. Emails were sent to 93 stakeholders, inviting submissions.
- 4.3 A Newsline story was published on our website on 30 January and was viewed 1,051 times.
- 4.4 A post on our newsfeed on 30 January reached 15,159 people, had 31 reactions, 107 comments and 17 shares.

Summary of submissions Ngā Tāpaetanga

- 4.5 The number of submissions received was **74, 3** of them being made via email and **71** through 'Have Your Say'.
- 4.6 Submissions were received from 16 organisations comprising: Te Mana Ora; five community boards; three residents'/neighbourhood associations; one not-for-profit marketing association; one charitable trust; one community project; one provider of education on sustainability and three businesses. There were 58 submissions from individuals.
- 4.7 There were 17 submitters (6 individuals, 4 local community boards, and 7 organisations) that indicated that they would like to speak to their submissions.
- 4.8 Most submissions (65 of 74) support the draft bylaw, either wholly (35 submissions) or in part (30 submissions). Overall, the proposal to replace the two current bylaws with a single draft bylaw received positive responses with submissions also generally supportive of specific changes (a. to h.) of the proposal. Those submitters that supported the proposed bylaw 'in part' expressed concerns about specific clauses or aspects of the proposed changes. These submissions are discussed below and in **Attachment A**.
- 4.9 While eight submissions responded 'No' to the question "Do you support the proposed changes to the bylaw?"; the staff evaluation of these submissions is that they do not oppose the substantive proposals for change. The 'opposing' submission by Winstone Wallboards Ltd (WWB), seeks clarity in the interpretation clause of the bylaw to make it clear that WWB is not a waste operation, while the seven 'opposing' individual submitters want Council's waste collection service to provide more choice in bin options.
- 4.10 A brief summary of feedback from submitters on the specific bylaw changes is provided below, including staff advice on possible changes to the bylaw, while **Attachment A** provides a more comprehensive summary of submissions.

Feedback from submitters by topic

- 4.11 The consultation material for the bylaw identified eight key changes to the bylaw (a-h below) and submissions were received on all of the following proposals for changes to the bylaw and the terms and conditions of the bylaw:
 - a. To allow the Chief Executive to make changes to terms and conditions.
 - b. To allow multi-unit residential developments to opt out of and not pay for Council's kerbside collection services in certain circumstances.
 - c. More flexible rules to allow for a wider range of bin options.
 - d. New requirements for waste management plans:
 - for multi-unit residential developments;
 - demolition and construction activities; and

- large scale events.
- e. New rules for:
 - unaddressed mail and advertising material; and
 - litter around donation boxes for clothing and household goods.
- f. Allowing the Council to the set standards for the collection points for recycling and diverted materials.
- g. Changes to the rules for waste handling and disposal facilities including landfills.
- h. Changes to definitions.

Proposal a. To allow the Chief Executive to make changes to terms and conditions

4.12 Submissions were received from two community boards (one in support and one opposing) on the proposal in the draft bylaw clauses 5 and 8 which allow the Chief Executive (CE) to make changes to the terms and conditions of the Bylaw.

4.13 Staff comment:

Under the current Waste Management Bylaw 2009, any change to the terms and conditions under the bylaw requires a decision of the (full) Council even if the change is minor, very localised in its effect or otherwise required e.g., to bring the terms and conditions into line with new central government regulation. Staff note also that the change to allow the CE to make decisions doesn't take away from the requirements for engagement/consultation under the Local Government Act 2002 (LGA), including the obligation to consult community boards as advocates for their communities.

Proposal b. Allowing residents to opt out of and not pay for Council's kerbside collection services

4.14 Clause 5 (5) of the draft bylaw provides for eligible residential properties to opt out of (paying for) the Council's kerbside collection services in certain circumstances. This clause is intended to provide an option for multi-unit developments e.g., when the Council's residential waste collection service provider is unable to access a large, multi-unit residential development; the clause requires any approval to opt out to be conditional on the approval of a Waste Management Plan for the property.

4.15 Six submitters commented on this proposal (three community boards, one residents' association and two individuals). While the individual submitters generally support the clause, the submissions from the community boards and residents' association express concerns about this provision, including that it may enable the more widespread adoption of user-pays services and could lead to sub-standard collection services for some residents.

4.16 Staff comment:

Having considered these submissions staff suggest that concerns may be addressed by an explanatory note under Clause 5 (5); the following is provided for the panel's consideration:

Explanatory note: *Properties would need to meet specific requirements including, completing a waste management plan that meets the objectives of the Council's Waste Management and Minimisation Plan, and demonstrating that there is ongoing provision, through a private contractor, of a service equivalent to the Council's three bin (rubbish, recycling and organics) service.*

Proposal c. More flexible rules to allow for a wider range of bin options

4.17 The proposal that drew the most (30) submissions related to the change in the terms and conditions to allow for the future provision of a wider range of bin options within Council's

kerbside collection service. There were 29 individual submitters and one community board in support of this proposal. There were no opposing submissions.

- 4.18 In terms of comments, individual submitters specified the changes they wanted to see in a more 'flexible' bin service, e.g., to be able to choose any size of bin to suit their particular family circumstances or that they should have the option to choose a larger green bin without payment of an additional charge.

- 4.19 Staff comment:

As all submissions are in support, no changes to the bylaw are required.

- 4.20 Staff also note that a significant piece of work would need to take place prior to making recommendations which could result in a change to the current levels of service for kerbside collection services. This could include evaluation of the rating structure, review of contractor operations, evaluating public refuse drop-off facilities and consultation with the wider community on emerging options. This work could be undertaken as part of preparing a bid for inclusion in the Long- Term Plan.

Proposal d. New requirements for waste management plans.

- 4.21 Five submissions were supportive of the new requirements for waste management plans (WMPs) for large scale events, and the requirement for WMPs for multi-unit residential developments and demolition and construction activities also drew only supportive submissions. Some of the submissions considered that the Council should go further in terms of requirements for WMPs.

- 4.22 Staff comment:

As all the submissions supported the proposal, no changes to the bylaw are required. Staff advise that, as part of the implementation of the bylaw, more guidance, including templates for WMPs, will be provided on the Council website.

Proposal e. New rules for unaddressed mail and advertising material

- 4.23 Ten submissions (from four community boards, three community organisations, NZ Marketing Association and three individuals) commented on this proposal, specifically on draft Clause 21, which currently reads:

“No person may deposit, cause, permit or authorise the deposit of any unaddressed mail or advertising material in any letterbox which is clearly marked "no circulars", "no junk mail", "addressed mail only" or with words of similar effect”.

- 4.24 While submissions support the intent of the clause, to reduce waste from 'junk mail' and litter around letterboxes, submitters express concerns about the (unintended) negative consequences of the current draft clause. They consider that the draft clause 21 is unduly onerous and will prevent the delivery of valuable communications including community newsletters, election material and notices from utility operators. As one individual submitter (50071) points out, “letter boxes are the only viable communication channel to reach all households regardless of age, cultural background, technology and on-line presence”.

- 4.25 Staff comment:

Having regard to the concerns in the submissions on this clause, staff recommend an amendment, new subclause 21(2) below, for the panel's consideration:

Sub-clause 21(2)

(2) Except that Clause 21(1) does not apply to the following materials which are permitted to be deposited in any letterbox:

- (a) material or public notices from any government department or agency, crown entity, local authority, or material from a network utility relating to the maintenance, repair, servicing or administration of that network utility;
- (b) communications or fund-raising material from local community organisations, charities or charitable institutions;
- (c) material from a political party, political candidate or elected member; or
- (d) a community newspaper or newsletter, unless the letterbox is clearly marked “no community newspapers” or with words of similar effect.”

Proposal f. Allowing the Council to the set standards for the collection points for recycling and diverted materials

4.26 One community board made a submission in support of this proposal. There were no opposing submissions.

Proposals g. and h. Changes to the rules for waste operations including landfills and changes to definitions

4.27 Three submissions were received on these topics from WWB, Teddington Quarry Ltd and EINZ Ltd. The primary concerns of these businesses relate to a perceived lack of clarity or inadequacy in some definitions. WWB is concerned that the draft bylaw ‘captures’ its manufacturing operation as a waste operation, EINZ queries the definition of Cleanfill while the representative of Teddington Quarry Ltd is concerned about a lack of clarity in the draft bylaw when compared with the “Cleanfill and Waste Handling Bylaw 2015”.

4.28 The staff assessment is that these concerns can be largely addressed by the addition of explanatory notes under the relevant definitions and by providing guidance for operators of landfills on the Council website. Further information on the submissions is in **Attachment A**.

Other issues

4.29 Submitters raised a number of issues in their submissions which are not directly related to the content of the draft bylaw or the draft terms and conditions. These submissions cover a range of topics including the need for incentives for residents and businesses to manage waste more sustainably, that provision should be made for the recycling of a wider range of plastics and submissions (in relation to ‘bin flexibility’) which want the Council to make improvements to the current levels of service. These submissions are noted.

Are shopping trolleys on public land an issue that needs to be further addressed?

4.30 As part of the ‘HaveYourSay’ consultation, people were also asked to provide their views on the issue of shopping trolleys being abandoned on public land. Of 74 submissions, 69 submitters responded to the question on shopping trolleys with 43 submitters (63%) agreeing that shopping trolleys in public places are an issue that needs further addressing while 25 (37%) of submitters on this topic do not think it is an issue.

4.31 Of the 69 submitters who responded to this question, 11 made additional comments which are tabled in **Attachment B** to this report. **Attachment C** provides background information on the development of the draft bylaw including the staff evaluation of the effectiveness of a bylaw clause to address the problems associated with shopping trolleys.

5. Policy Framework Implications Ngā Hīraunga ā- Kaupapa here

Strategic Alignment Te Rautaki Tīaroaro

- 5.1 This report supports the [Council's Long Term Plan \(2021 - 2031\)](#):

Policy Consistency Te Whai Kaupapa here

- 5.2 The decision is consistent with Council's Plans, Policies, and Bylaws - Waste Management Bylaw 2009, and Cleanfill and Waste Handling Bylaw 2015.

6. Resource Implications Ngā Hīraunga Rauemi

Capex/Opex Ngā Utu Whakahaere

- 6.1 Not relevant. This report only provides information of the submissions received on the Proposed Waste Management and Minimisation Bylaw 2023.

7. Legal Implications Ngā Hīraunga ā-Ture

Statutory power to undertake proposals in the report Te Manatū Whakahaere Kaupapa

- 7.1 The decision-making authority for bylaws sits with the Council and cannot be delegated to a Committee of Council or other body. The role of the Hearings Panel is to consider and hear submissions, deliberate on those matters raised, and make recommendations to the Council on the final form of the bylaw.

Other Legal Implications Ētahi atu Hīraunga-ā-Ture

- 7.2 To this point, the legislative requirements of the local Government Act 2002 have been met.
- 7.3 Submissions made on the proposals should be received by the Hearings Panel with an open mind and should be given due consideration.
- 7.4 When deliberating on submissions, the Hearings Panel should keep in mind the Council's bylaw-making powers, and the scope of the consultation proposals. Significant changes from original proposals may require further consultation.







8. Risk Management Implications Ngā Hīraunga Tūraru

- 8.1 With any bylaw-making process, there is always a risk that members of the public or organisations may not agree with the proposals finally adopted by the Council and seek judicial review proceedings. This risk can be managed by careful compliance with the provisions of the Local Government Act 2002, and common law relating to bylaws.

9. Next Steps Ngā Mahinga ā-muri

- 9.1 The Hearings Panel will consider the matters raised in submissions, deliberate on those matters, seek any further advice from staff, and make recommendations to the Council on the final form of the bylaw.

Attachments Ngā Tāpirihanga

No.	Title	Reference	Page
A  	FINAL VERSION-Attachment A Summary of submissions Comments on specific clause of the draft waste bylaw and staff advice	23/812493	12
B  	Summary of feedback from submitters on shopping trolleys	23/786169	27
C  	Memo to Hearings Panel on shopping trolleys	23/820560	28

In addition to the attached documents, the following background information is available:

Document Name - Location / File Link
Not applicable

Confirmation of Statutory Compliance Te Whakatūturutanga ā-Ture

<p>Compliance with Statutory Decision-making Requirements (ss 76 - 81 Local Government Act 2002).</p> <p>(a) This report contains:</p> <ul style="list-style-type: none"> (i) sufficient information about all reasonably practicable options identified and assessed in terms of their advantages and disadvantages; and (ii) adequate consideration of the views and preferences of affected and interested persons bearing in mind any proposed or previous community engagement. <p>(b) The information reflects the level of significance of the matters covered by the report, as determined in accordance with the Council's significance and engagement policy.</p>

Signatories Ngā Kaiwaitohu

Authors	Evangeline Dispo - Policy Analyst Ruth Littlewood - Senior Policy Analyst Ged Clink - Manager Resource Recovery
Approved By	Ged Clink - Manager Resource Recovery Lynette Ellis - Head of Transport & Waste Management

Attachment A - Summary of submissions by clause including staff advice for deliberations on the draft Bylaw and Terms and Conditions

PROPOSED BYLAW CLAUSE	SUBMITTER	SUMMARY OF SUBMISSION	STAFF COMMENTS INCLUDING RECOMMENDATIONS
Clause 3. Interpretation	Winstone Wall Boards Ltd. (WWB)	<i>Construction and demolition waste</i> WWB considers that this definition 'captures' their operational waste given the reference to 'plasterboard'. WWB seeks for the definition to be amended to clarify that waste generated from the manufacturing process is not included in the definition.	Staff consider that this definition does not impact on WWB because WWB is a manufacturer of building products and is not carrying out any demolition construction activities or receiving or processing waste products from demolition or construction sites. However, for additional clarity staff recommend an explanatory note e.g., Explanatory note: For clarity and the avoidance of doubt, waste created during the manufacture of building products is not 'construction or demolition waste' in terms of this bylaw.
	Winstone Wall Boards Ltd. (WWB)	<i>Commercial and industrial waste</i> WWB considers and seeks clarification requested on the intended use of this definition and that it does not have any operational requirements associated with the definition and include an explanatory note stating – 'there are no operational or licencing requirements in relation to this definition.	No amendment is required.
	Winstone Wall Boards Ltd. (WWB)	<i>Waste operation</i> WWB consider that the definition may unduly capture their internal recycling of production waste. WWB seeks an exemption that onsite 'processing, recycling and re-using' of its own 'commercial and industrial waste' where it is fed back not the manufacturing cycle is not captured in this definition.	This clause will not affect WWB as a manufacturer of (building) products. However, for clarity, staff recommend that an explanatory note is added to the definition, e.g., Explanatory Note: For clarity and the avoidance of doubt, a manufacturing operation which produces and recycles waste during the manufacture of products is not a Waste Operation for the purposes of this bylaw and does not require a licence under this bylaw.

PROPOSED BYLAW CLAUSE	SUBMITTER	SUMMARY OF SUBMISSION	STAFF COMMENTS INCLUDING RECOMMENDATIONS
	Teddington Quarry Ltd.	The Council for clarity needs to line up their definitions with the disposal classes set out in the Waste Minimisation Act and regulations i.e., Landfill classes 1 – 5 as operators will now be working with the WMA and the new bylaw. The definitions need to clearly link back to the DOE classes.	No amendment to the bylaw is required. The definitions in the bylaw are consistent with those of the Waste Minimisation Act 2008, current regulations under this Act and the Technical Guidelines for Disposal to Land -Revision 3, (Waste Management Institute of New Zealand).
	EINZ Ltd.	The current bylaw holds a wish-wash definition of cleanfill and should be better defined to assist with the development of land. New Zealand is currently the second largest contributor of landfill waste in the world, with over 50% of that waste made up of soil. Canterbury holds an array of soil types all with differing background levels, and the recent changes to foundational requirements for buildings has resulted in significant increases in soil disposal volumes, which often cripple the redevelopment of residential properties. Not to mention, without a clear understanding of Asbestos in Soil there is no cheap way to get rid of soil containing the natural mineral, asbestos. The bylaw should better outline what is cleanfill and include a clear understanding of the rules around asbestos, as virgin excavated natural material could also include natural deposits of asbestos minerals.	No amendment to the bylaw is required. This submission addresses a range of matters outside the scope of the bylaw e.g., the management and development of contaminated land. The definitions in the bylaw are consistent with the Waste Minimisation Act 2008, the regulations under this Act and Technical Guidelines for Disposal to Land -Revision 3 (Waste Management Institute of New Zealand).
PART 1 – RESIDENTIAL WASTE COLLECTION SERVICES			
Clause 5. Kerbside collection services	Waihoru Spreydon-Cashmere-Heathcote Community Board	The draft bylaw proposes that residents be allowed to opt out of, and not pay for, the Council's kerbside collection services in certain circumstances, for example where the Council's contractor cannot easily access an area. While we support this when access is truly limited, we do not support transitioning to a user-pays service with no or loose criteria for opting out of collection services.	No amendment is required. Under the bylaw, the Council's approval of a WMP and of the alternative collection service is required before residents can opt out.
Clause 7. Non-compliance with conditions for kerbside collection	50071	<i>On kerbside dumping</i> I would like to see the Bylaw specifically address an issue or great concern to many neighbourhoods across Christchurch, and I cannot find it mentioned in the Draft Bylaw. The practice of putting unwanted household items like mattresses and couches onto the footpath is vexing for many residents. Research done by the Inner City Revitalisation	No amendment is required. Staff note that mattresses, couches, household goods etc., in good condition, are free to 'dispose of' at the likes of the EcoStore.

PROPOSED BYLAW CLAUSE	SUBMITTER	SUMMARY OF SUBMISSION	STAFF COMMENTS INCLUDING RECOMMENDATIONS
		<p>Working Group (of which I was a member) revealed it is an extremely high neighbourhood frustration.</p> <p>The Inner City East work revealed that the phenomenon is borne from (a) some people think it is acceptable to do this, (b) seeing other people doing it reinforces this view, and (c) it can be difficult to dispose of these items if the householder lacks budget and/or transport to do so.</p> <p>I think that in fairness to all members of the public (including those mentioned in (a) above), we need to be explicit that it's not cool to be doing this. I do understand the recycling ethos that may lead to some thinking it's OK, but a lot of the stuff that goes out is rain-sodden rubbish. Aside from the Bylaw, there are potential to help reduce the practice. However, I think we should not miss this golden opportunity to provide clear dis-incentivisation by providing for it in the bylaw.</p>	<p>Leaving 'waste' household items in a public place is littering under the Litter Act 1979 and subject to the fines under the Act (as noted by the submitter).</p> <p>Noted that his submitter wants initiatives to inform, educate, and provide disposal alternatives. (This is not a bylaw matter.)</p>
Clause 8. Community Collection Points	Te Mana Ora (NPHS)	<p><i>Community Collection Points</i></p> <p>The revision of the definition of community collection points is likely to improve access to appropriate waste disposal in smaller communities where kerbside collection is not feasible. This will also allow Council to assist communities with waste collection for large scale events. Additionally, the incidence of fly-tipping is likely to reduce in area that have adequate waste disposal options available.</p>	<p>No amendment required.</p> <p>Submitter supports Clause 8 Community Collection Points.</p>
	Waipapa Papanui-Innes-Central Community Board	<p>Allow the Council to set standards for the collection points for recycling and diverted materials, given the likely introduction of container return schemes.</p> <p>The Board is supportive of carefully introduced, well-publicised and well-supported standards.</p>	<p>No amendment required.</p> <p>Submitter supports Clause 8 Community Collection Points.</p>
	Remix Plastic and Sustained Fund Ltd.	<p>We understand that there will be significant systems and updates implemented when the government advises on Container Return Schemes. We are not convinced the 'Community Collection Points (CCP)' section has enough details for this to fall in to at this stage and may require more when a design has been approved.</p>	<p>No amendment required.</p> <p>Noted. The Bylaw provides for the Council (CE) to make additional controls under the bylaw if needed.</p>
	Wainui Residents' Association	<p><i>Community Collection Points</i></p>	<p>No amendment required.</p> <p>Submitter supports Clause 8 Community Collection Points.</p>

PROPOSED BYLAW CLAUSE	SUBMITTER	SUMMARY OF SUBMISSION	STAFF COMMENTS INCLUDING RECOMMENDATIONS
		We support <i>Clause 8</i> . Our community does not have domestic kerbside rubbish and recycling collection or collection facilities at public reserves. We rely on people taking their waste away and use of the Community Collection Point at Barry's Bay.	
Clause 10. Waste management for multi-unit residential developments	Te Mana Ora (NPHS)	<i>Clause 10 (Multi-unit developments):</i> Te Mana Ora is pleased to see the inclusion of a threshold-based waste management plan clause for multi-developments and for some existing multi-unit residential developments. The occupancy rate of such dwellings can exceed anticipated occupancy rates and thus the waste generated may exceed manageable levels, leading to fly-tipping and excess waste if not managed adequately. A threshold-based waste management plan is a good prompt for this to be investigated further on a case-by-case basis.	No amendment required. Submitter supports Clause 10.
	Victoria Neighbourhood Association	The recommended additions to the Bylaw are insufficient in cases where the multi-units are being used for unhosted short term/Airbnb rentals. Visitors often do not know (or don't care) what the various bins are to be used for, what can be recycled and when to put which bin out. Many unit owners are absentee landlords and property managers are not hands on enough to ensure rubbish is handled properly. SUGGEST that this be covered by appropriate addition to the Bylaw, but unsure what would be appropriate wording, sanctions or requirements.	No amendment is required. Staff note that this is not a bylaw issue, but something that has to be addressed by owners/landlords.
	Remix Plastic and Sustained Fund Ltd.	5.5 states that <i>eligible residential properties may opt out of the Council's kerbside collection service provided that the Council approves a Waste Management Plan (WMP) for those properties</i> . More information on what would be expected would be useful. We would hope it includes allowances for recycling, organics and landfill, with emphasis on reduction. It is great to see the Council's expectations for Waste management for multi-unit residential developments include collection of organics and recycling. 10.2 states the Council <i>may</i> require WMP approved but we feel that this should be compulsory given the known difficulties with waste collection in the central city. We agree the 10.3 statement on expectations of existing multi-unit residential developments. Again, we feel that these should be expected to provide a WMP and adequately provide collection for recyclable and organic waste to maximise diversion from landfill.	No amendment required. Submitter generally supports Clause 10. The bylaw makes any 'opt out' and WMP approval conditional on provision of an appropriate collection service for recycling and green waste. Staff propose to set out more information on these requirements on the CCC website. Staff do not consider that all multi-unit developments will need a WMP, e.g., if they are using the Councils collection service. Under 10(3) Council may require an WMP to address problems with current arrangements.

PROPOSED BYLAW CLAUSE	SUBMITTER	SUMMARY OF SUBMISSION	STAFF COMMENTS INCLUDING RECOMMENDATIONS
	50070	If the bylaw covers - Where multi-residential buildings have the option to recycle but instead should be made to recycle as the volumes of recyclables could be sizeable, item #8, hence management be presented with not a waste management but a waste and minimisations plan.	No amendment required. Inferred - the submitter wants the emphasis of any WMP to be on waste minimisation.
PART 2 – WASTE OPERATIONS			
Clause 11. Objectives	Waihoru Spreydon-Cashmere-Heathcote Community Board	We support the revised rules for disposal facilities as they divert waste from landfill to be recycled. We also ask that more types of materials are recycled when possible.	Note support for the Bylaw. No amendment required.
Clause 12. Licences required for waste operations	Winstone Wall Boards Ltd. (WWB)	WWB considers that the current wording may unduly act as a deterrent for on-site recycling. WWB seeks an exemption to be included for the licence required for waste operators.	No amendment required as WWB does not require an exemption. Staff have recommended explanatory note under the definition of waste operation. (see above).
	Waipapa Papanui-Innes-Central Community Board	Amend the licensing requirements for waste operators, including for the collection of data, to enable more effective monitoring of the effectiveness of the Council's Waste Management and Minimisation Plan The Board recognises the importance of data and monitoring in relation to the Council's Waste Management and Minimisation Plan and supports considered measures in this respect.	Note support for the Clause. No amendment required.
Clause 17. Controls on the operation of waste collection services from a public place	Central Riccarton Residents' Association Inc.	We know it is a difficult job being a driver especially in narrow streets with cars parked nose to tail on each side of the street BUT it is really annoying when the empty bin lid is left open especially on a rainy day or the bin is dropped on its side and this makes it extremely difficult for people using footpaths with walking frames, mobility scooters, and people pushing prams, prams, wheelchairs, etc There are too many rules confusing residents about what should/should not go into yellow bins. For example, the recycling plant should have the technology to receive ALL plastic containers. Also, the recycling plant should have the technology whereby all glass jars can be washed clean in the plant and the same for cans which have contained food - for example	Noted the concern which is not a bylaw issue. This is not a problem with the bylaw or terms and conditions. Staff note that it would not be technically feasible for the recycling plant to process

PROPOSED BYLAW CLAUSE	SUBMITTER	SUMMARY OF SUBMISSION	STAFF COMMENTS INCLUDING RECOMMENDATIONS
		salmon, mackerel - which are very hard to clean at home. If council cuts out the finickity rules, there will be a much greater uptake of the yellow bins.	unsorted plastics and dirty recycling from more than 300,000 individuals.
	Waimāero Fendalton Waimairi- Harewood Community Board	The Board is experiencing issues with charity clothing bins and has discovered that there is currently no policy or regulation to manage where they are placed. The Board believes the Council needs to introduce rules to manage this.	This submission in support of Clause 17 is noted.
Clause 18. Controls on the operation of waste deposit points in a public place	Central Riccarton Residents' Association Inc.	The dumping of rubbish on the side of the road is a problem NOW. Being allowed to opt out of the bin service for the sake of a reduction in rates is a RECIPE FOR DISASTER - socially and environmentally.	This submission is noted.
PART 3 – OTHER WASTE MATTERS			
Clause 19. Construction and demolition Waste Management Plan (WMP)	Te Mana Ora (NPHS)	Recommends the inclusion in the Bylaw of controls on dust generation to be a requirement to be considered in these Waste Management Plans. This will help limit the adverse impact of fugitive dust on the health of the public near the activity. Te Mana Ora also supports the development of Waste Management Plans by the owners or developers of construction or demolition sites, as this provides an additional mechanism to protect public health. However, we acknowledge that this may only be practical for commercial rather than residential properties, unless construction/demolition involves more than a single residential property.	Note support for this clause. Staff note that dust generation is not a waste bylaw issue. It is an RMA issue.
	Winstone Wall Boards Ltd. (WWB)	WWB considers that the current wording of the WMP may require their operation to prepare a WMP. WWB seeks an exemption to be included to clarify that manufacturing facilities of materials listed in the definition of 'construction and demolition waste' would not be required to prepare a WMP under section 19(1).	No change is required. WWB is not required to prepare a WMP for construction and demolition waste.
	Remix Plastic and Sustained Fund Ltd.	We highly commend the Council for stating that Construction and demolition Waste Management Plans and Event Waste Management Plans include <i>methods which will be used to reduce waste going to landfill</i> (19.2.b). We hope the Council will emphasise the importance of this in the communications with companies and events.	Note support for this clause.

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Clause 20. Event Waste Management Plan (WMP)	Te Mana Ora (NPHS)	Te Mana Ora is pleased to see the inclusion of a threshold-based event waste management plan clause. A waste analysis report for these events is critical to identifying short-term issues as well as long term trends in waste disposal content. The threshold of 1000 attendees is a reasonable threshold to ensure that large scale events are required to manage waste disposal adequately whilst allowing smaller scale events to proceed under good waste management practice. In line with other management plan templates. Te Mana Ora recommends that small scale events have a waste management plan available upon request to Council.	Note the support for the requirement for a WMP for events.
	Wainui Residents' Association	<i>Clause 20 Event Waste Management Plan</i> Wainui is a location of choice for events such as the Ocean Swim Series and the Canterbury Classic Triathlon. These events typically make use of the Stanbury Reserve and foreshore. Several hundred people are involved in these events, but not the 1000 people trigger point for an event waste management plan mentioned in 20(2). Nonetheless, this number of people concentrated on a small area of environmentally sensitive reserve and foreshore does present a risk if waste is not managed. Appreciating the need to balance the attractiveness of the location to events, and compliance with rules (bylaw), we ask for consideration of a more flexible trigger number requiring a waste management plan in combination with an additional point 20(2)(c) that considers the environmental sensitivity of the location (including base population of the community and availability of community waste collection facilities).	Where Council's consent is required for any event, the 1000 people trigger point is not prescriptive. Council may require a WMP for any events that generate large amounts of waste which take place on public land under the Council's control or which are sponsored/supported by the Council.
	Remix Plastic and Sustained Fund Ltd.	We are also very happy to see the expectation that events will have to state <i>the steps which will be taken to prioritise the use of reusable systems</i> (20.3.C). This is an incredibly important way to, not only reduce waste to landfill but educate attendees. We hope the data gathered under 19.3 and 20.5 will be made public in some form to provide insights and set a benchmark for working towards the Council's emissions targets.	Note the support for the requirement for a WMP for events.
	50078	<i>Part 3, 20. Event management:</i> Events should be required to separate waste into the three main streams, red, yellow green. Even if it is at additional cost to the event. Events often collect many cans and bottles that could be recycled and green waste that can be compared. These events are also an opportunity to educate the public on proper waste stream separation. For more profitable waste recovery the council should consider an additional blue waste stream for paper and cardboard waste that is common overseas.	This submission is noted. Staff note that the Council requires a WMP for events, see 20.3.C

PROPOSED BYLAW CLAUSE	SUBMITTER	SUMMARY OF SUBMISSION	STAFF COMMENTS INCLUDING RECOMMENDATIONS
Clause 20. (continuation) Event Waste Management Plan (WMP)	50070	<p><i>Litter at events</i> in addition to the managing litter a way to reduce litter by NOT having stall holders bring a lot of fliers and e.g., disposable buntings etc to the event and reduce the items that cannot be recycled e.g., glad wrap.</p>	<p>This submission is noted. Staff consider that the issue is addressed in clause 20.3</p>
Clause 21. Unaddressed mail and advertising material	Waihoru Spreydon- Cashmere- Heathcote Community Board	<p>The draft bylaw proposes that no person may deposit any unaddressed mail or advertising material in any letterbox marked “no circulars,” “no junk mail,” “addressed mail only” or with words of similar effect. While we support not allowing “junk mail” as this reduces waste, other types of unaddressed mail can be valuable. For example, community newsletters, public notices, election material, information about consultations and census documents are typically unaddressed.</p> <p>We suggest that “junk mail” and “unaddressed mail” are more clearly defined in the bylaw to address this issue. Auckland Council’s Waste Management and Minimisation Bylaw 2019 includes a useful differentiation for reference: (refer to the table on TRIM Ref 23/281821).</p>	<p>Staff have noted the submitters concerns and agree that the bylaw should be amended. Staff recommend an amendment to the bylaw, e.g. 21(2) below: Sub-clause 21(2) (2) Except that Clause 21(1) does not apply to the following materials which are permitted to be deposited in any letterbox: (a) material or public notices from any government department or agency, crown entity, local authority, or material from a network utility relating to the maintenance, repair, servicing or administration of that network utility; (b) communications or fund-raising material from local community organisations, charities or charitable institutions; (c) material from a political party, political candidate or elected member; or (d) a community newspaper or newsletter, unless the letterbox is clearly marked “no community newspapers” or with words of similar effect.</p>

PROPOSED BYLAW CLAUSE	SUBMITTER	SUMMARY OF SUBMISSION	STAFF COMMENTS INCLUDING RECOMMENDATIONS
Clause 21. (continuation) Unaddressed mail and advertising material	Waipapa Papanui- Innes-Central Community Board	<p>The Board is concerned that the rules not unfairly affect or discourage the circulation of community newsletters and publications that foster community activation and participation and council social isolation.</p> <p>The Board considers that further clarity is needed around what advertising material would trigger adverse provisions. This is in light of community concern Board members have heard in respect of materials that residents' associations and other community groups circulate to inform neighbourhoods of their activities and similar initiatives.</p>	This submission is noted. See proposed amendment to address the concern above.
	Waipuna Halswell-Hornby- Riccarton Community Board	<p>The Board notes the new rules that address the problems caused by unaddressed mail and advertising material, and to deal with nuisance from litter, including litter around donation boxes for clothing and household goods.</p> <p>While the Board is generally supportive of the rule it considers that there needs to be more clarity about what is regarded to be advertising material for the purpose of clause 21. The definition currently proposed in clause 3 is:</p> <p>“Advertising material means any message which:</p> <ul style="list-style-type: none"> (a) has printed content controlled directly or indirectly by the advertiser; and (b) is expressed in any language and communicated in any medium with the intent to influence the choice, opinion or behaviour of a person” <p>The Board considers that this definition is very broad and could inadvertently capture.</p> <ul style="list-style-type: none"> 1.1. The Board considers that this definition is very broad and could inadvertently capture election campaign material which is important to be provided to all voters, particularly with relatively low voter participation. 1.2. The Board therefore suggests a change to the definition of “Advertising material “to make it clear that it excludes any authorised election campaign material in the period within eight weeks of a national or local election. 	This submission is noted. See a proposed amendment to address the concern above.
	Waitai Coastal- Burwood- Linwood Community Board	<p>The Board opposes this clause....</p> <p>“When coupled with clause 26, an individual could be fined \$20,000 for breaching this, which seems excessive. It could have a chilling effect on civic discourse, for instance what happens</p>	This submission is noted. See proposed amendment to address the concern above.

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Clause 21. (continuation) Unaddressed mail and advertising material		<p>if everyone has one of those signs? They consultation documents there's no Bill of Rights Act (BORA) impacts, but section 14 of BORA says: "Everyone has the right to freedom of expression, including the freedom to seek, receive, and impart information and opinions of any kind in any form."</p> <p>The Board questions how postal communications from the Council, such as flyers, would be covered should this proposal be adopted. E.g., Start Work Notices etc. "</p>	
	Victoria Neighbourhood Association	<p>Clause 21 (Unaddressed mail): Current ways of reducing unwanted advertising material/circulars seems to be working. AGREE with (a) (b) and (c) of this clause. HOWEVER, there are some exemptions that need to be catered for; in particular, notices from the recognised Residents' Association in each area. Communications for new residents or ones not on formal contact (email) contact lists are often distributed through letterboxes. There could be a requirement that such communications MUST include the Association's contact details, to be used if a resident wants to opt out of receiving future notices.</p>	This submission is noted. See proposed amendment to address the concern above.
	Halswell Community Project Manuka Cottage	<p>As an employee of Manuka Cottage, I am involved with putting the Addington Times out into Addington every month. We put out around 3000 of these. We ask our volunteer deliverers not to put the mail into boxes that say addressed mail only or no Addington Times and tell them not to put anything into boxes that are not being cleared. This is written on each newsletter so that people are able to stop receiving them if they don't want them. ...</p> <p>A blanket ban on putting unaddressed mail into letterboxes with any kind of label will potentially throw the baby out with the bathwater. You could make an exception for community notices and newsletters and that would probably cover these scenarios.</p>	This submission is noted. See proposed amendment to address the concern above.
	Phillipstown Community Centre Charitable Trust	<p>We have noticed that our community is more reachable with physical flyers and advisement rather than online (limited access to internet, limited IT literacy). Not being able to cover the whole neighbourhood with our communications limit the impact of our services (especially when we organise Community Conversations around issues in the neighbourhood).Moreover, Clause 26 prescribes a very onerous penalty that in our opinion exceeds the seriousness of the behaviour.The review of the bylaw offers the opportunity to clarify what unaddressed mail and advertising material is and the possible exceptions.</p>	This submission is noted. See proposed amendment to address the concern above.

PROPOSED BYLAW CLAUSE	SUBMITTER	SUMMARY OF SUBMISSION	STAFF COMMENTS INCLUDING RECOMMENDATIONS
Clause 21. (continuation) Unaddressed mail and advertising material		We support the proposal of Clause 21 to be amended to provide exclusions for materials such as public notices, local community newsletters, notices of public meetings, charitable media.	
	The NZ Marketing Association	The National Code of Practice for Unaddressed Mail was developed in conjunction with Rodney, Franklin and Auckland councils, specifically working with their waste management departments to develop appropriate waste management Bylaws. Many other local councils have now used the code as the basis of their Bylaw. The basic principle of the code is to allow the householder to control the contents of their letterbox. I believe that clause 21 in your proposed Bylaw achieves that purpose to a degree in that it controls promotional mail (junk mail) but fails to allow for the rights of community newsletters, charities and even local government to communicate with householders.	This submission is noted. See proposed amendment to address the concern above.
	50040	- I fully support the inclusion of this within the Bylaw (section 21). I also support the inclusion of an exclusion clause to 21.1.a similar to; 1. <i>Clause 21.1(a) does not apply to:</i> <i>(a) material or public notices from any government department or agency, crown entity, local authority, or material from a network utility relating to the maintenance, repair, servicing or administration of that network utility;</i> <i>(b) communications from local community organisations, charities or charitable institutions including community newsletters unless the letterbox is clearly marked "no community newspapers" or with words of similar effect.</i>	This submission is noted. See proposed amendment to address the concern above.
	Individual submission received via email	I would like to continue putting fliers from Christchurch M.P.s and the Labour Party into letter boxes without incurring a fine from the C.C.C. I agree with the concern of cutting back on waste. I am careful not to put leaflets/ fliers into letter boxes marked 'Addressed Mail Only,' or 'Stamped Addressed Mail.' All other letter boxes get one. This leaves the choice with the individual household. Curtailing this activity would be a backward step for our democracy.	This submission is noted. See proposed amendment to address the concern above.
Clause 22. Nuisance and litter	Te Mana Ora (NPHS)	Te Mana Ora is pleased to see this included, however also queries the legal relationship with the Land and Water Regional Plan and section 29 of the Health Act 1956. Te Mana Ora recommend that Council clarify when this clause would be used and whether it gives effect to the LWRP and the Health Act 1956.	No amendment required. This bylaw is made under the Health Act 1956, but the reference to the LWRP (regional plan under the Resource Management Act) is not relevant to the bylaw.

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Clause 22. Nuisance and litter	Waitai Coastal- Burwood- Linwood Community Board	<p><i>Clause 22 (1), No person may: (a) Allow any accumulation of waste on any premises they own, occupy or manage to become offensive, a nuisance or likely to be injurious to health; or (b) Use an approved receptacle in a manner that creates a nuisance, is offensive or is likely to be injurious to health.</i></p> <p>When coupled with clause 26, this could see impoverished and unwell people further marginalised. It also creates room for malicious and vexatious complaints from neighbours. The Board are concerned about people who are without financial or psychosocial resources being mistreated.</p> <ul style="list-style-type: none"> • Taking a trailer-load of rubbish to the dump is not within everyone's capability or resources, if the Council going to have the "stick" then we need to provide some kind of hard rubbish collection/service for people who are in need (at least). • The Board asks how will the Council address the significant equity issues surrounding how to deal with waste? • The Board would like the principle of proportionality with regard to any enforcement measures to be explicitly stated in the by-law. 	<p>This submission is noted.</p> <p>This submission is noted. Staff do not consider that a bylaw is the appropriate 'place' to outline the Council's compliance strategy which <u>is</u> to take an appropriate proportional response to non-compliance. The strategy is attached/linked: Compliance Strategy</p>
	Victoria Neighbourhood Association	<p><i>Clause 22 (Nuisance & litter):</i></p> <p>Agree with this clause, but it needs to specifically address problems arising from residents dumping large items (sofas, chairs, mattresses etc), rather than taking them appropriately through a recycling centre or Transfer Station. Unless the dumped items are on a public space (footpath, street), our understanding is that CCC cannot remove them if contacted. We do appreciate, however, that if the dumped items ARE collected if a complaint is made, that can encourage more people to dump with abandon!</p>	<p>Noted. This is not a bylaw matter.</p>

TERMS AND CONDITIONS for Kerbside Collections and Community Collection Points			
Clause 1. Types of kerbside collection services	Waipapa Papanui-Innes-Central Community Board	<p>Provide more flexible rules for Council kerbside collection service e.g., to allow for a wider range of bin options.</p> <p>Flexibility is supported where it will assist communities to develop the most effective options for achieving their aspirations for convenience and amenity. Dealing with waste in ways that can be adapted to the circumstances is supported as common sense. We understand there may be cost implications for residents choosing different sized bins but ask that these be kept to a minimum in order to encourage the increased use of recycling and organics bins over rubbish bins.</p>	This submitter supports the proposal for more flexible rules for Council kerbside collection service. No change to the bylaw is required.
Clause 3. Permitted waste	Waimāero Fendalton-Waimairi-Harewood Community Board	<p>The Board encourages the Council to provide more information to the community on what to do with plastics that cannot be put in the yellow bins, for example bottle caps, soft plastics and bread ties. The Board feels there is an unmet need for services or information on how to manage these items sustainably, and an opportunity to collaborate with organisations who want to find solutions.</p> <p>The Board is experiencing issues with charity clothing bins and has discovered that there is currently no policy or regulation to manage where they are placed. The Board sees this as a gap that needs to be addressed immediately. At present there is no redress if a bin owner does not manage issues to do with their bin including noise and litter, and also no controls around where bins are placed or how many can be placed there. The Board believes the Council needs to introduce rules to manage this. The Board is fully supportive of charity clothing bins, but they need careful management to ensure they are in the right place and do not create a nuisance.</p>	<p>Noted. This is not a bylaw matter. This concern is addressed in the Council's waste education programmes.</p> <p>Staff note that donation/charity bins and the management of noise/litter is addressed in the proposed bylaw under clause 18 and the explanatory note.</p> <p>This submission is noted in terms of an implementation action.</p>
Clause 9. Assisted on-property service	50078	<p><i>Kerb collection 9.1 assistance:</i></p> <p>This assistance should not be limited to red bins only. Disabled people should not be prevented from participating in recycling and green waste via the council collection.</p>	<p>This submission is noted. Staff consider that extending the assisted on-property service to recycling and organics would be desirable.</p> <p>However, in order to provide for this additional service Council's approval would be required for the additional funding.</p>
Clause 10. Inner city collection	Remix Plastic and Sustained Fund Ltd.	Regarding the Council's inner-city collection of waste and recycling – the official plastic bags pose a large litter risk and create more waste by being a disposable bag. We would like to see reusable alternatives to these explored.	This submission is noted.

Cross-cutting issues raised			
Allowing the CE to make changes to Terms and conditions	Waipapa Papanui-Innes-Central Community Board	On allowing the CE to make changes to Terms and Conditions. It is recognised that regulatory tools should be adaptable and without undue bureaucracy to enable a fair, relevant, and effective response to circumstances. To the extent that this is consistent with this proposed change and ensuring that consultation processes are retained, including briefing community boards where relevant to their role in advocating for their communities, this aspect to the draft bylaw is supported by the Board.	This submission supports the proposal which allows the CE to make changes to Terms and Conditions. Staff note also that the consultation and engagement requirements of the LGA 2002 continue to apply with respect to any change in the terms and conditions; they are not affected by this proposal for CE to approve changes This submission in opposition to the change is noted.
	Coastal-Burwood-Linwood Community Board	This submitter opposes the change to allow the CE to make changes to the Terms and Conditions.	
Provision for 'opting -out'.	Waimāero Fendalton-Waimairi-Harewood Community Board	The Board continues to have reservations about allowing residents to opt out of the service. Council services are provided for the benefit of everyone and should be operated very cost effectively. We have concerns about the long-term impact on our communities if we move to a user-pays model and begin eroding the economies of scale for these services. It is the Board's view that residents should be using the Council kerbside collection service unless there are genuine reasons why it would be unreasonable or impractical for the Council contractor to access the site.	This submission appears to give qualified support for opting out in specific circumstances. This is noted.
Provision for 'opting out'	Waipapa Papanui-Innes-Central Community Board	Allow residents to opt out of, and not pay for, Council's kerbside collection services in certain circumstances e.g., where Council's contractor cannot easily access an area. With increasing intensification, the Board supports the need for practical alternatives to large kerbside clusters of individual units' bins as these present unpleasant and bulky obstructions for pedestrians to avoid that also significantly reduce neighbourhood amenity however temporarily.	This submission which supports providing for residents to 'opt-out' in certain circumstances is noted.
	Central Riccarton Residents' Association Inc.	CRRA Inc is TOTALLY OPPOSED to having the ability for residential properties to opt out and not pay for kerbside collection services.	Noted. This submitter is opposed to allowing residential properties to opt out.
	49848	I am strongly in support of e. "allow residents to opt out of, and not pay for, the Council's kerbside collection services in certain circumstances e.g., where the Council's contractor cannot easily access an area".	This submission in support is noted.
	49848	For anything like waste management where we would prefer for less waste to be produced, moving to a more user-pays system makes sense. Would only caveat that it is important that	This submission in support of 'opting out' and for WMPs is noted.

		residential renters are guaranteed access to bins. I am strongly in support of g. "Allow new requirements for waste management plans in some circumstances so that waste is managed more effectively", especially for multi-unit residential developments. It is very important that we dramatically increase housing density in the city and make changes to support this.	
	49848	I support j. "Revise provisions for waste handling and disposal facilities to support the diversion of materials from landfill and to ensure that all waste materials are disposed of appropriately.", with the caveat that while diverting waste from landfill is a positive in and of itself, this should not be done in any way that is likely to significantly increase greenhouse emissions. Landfill is a more manageable problem than climate change.	This submission in support is noted. Staff comment that one of the drivers of diverting materials from landfill is to reduce greenhouse gas emissions and that the diversion of waste from landfill and the reduction in greenhouse gases are not mutually exclusive goals.
General comments on the controls on landfill waste operations			
	Teddington Quarry Ltd	These comments are only about the <u>cleanfill</u> aspect of the bylaw. To date the bylaw governing cleanfills has been very clear, but with the move to an omnibus bylaw, that clarity is lost. Fees and charges, should also take account of the scale and complexity of the operation.	No change to the bylaw is required. The submitter's concern is that the draft 'omnibus' bylaw provisions lack clarity, especially when compared to the Council's Cleanfill and Waste Handling Bylaw 2015. Staff propose to address the submitter's concern by making available on the Council's website a guide to the bylaw specifically targeted to operators of landfill disposal sites. Staff also note that the new draft bylaw has few changes that will affect operators of landfill disposal sites and that any changes are intended to align the bylaw with changes to central government regulation and to current industry standards. Staff note that the setting of fees and charges is not a bylaw matter.

Attachment B - Comments received on shopping trolleys

Are shopping trolleys on public land an issue that needs to be further addressed?	Name of organisation / individual
Yes. Regarding shopping trolleys, we consider that they should be owners' responsibility and the nuisance caused by them being abandoned (even on the cycle lanes!) should be clearly addressed by Council. If requesting that owners recollect them is not effective, then other options should be considered, as for instance: providing a chip that block the wheels when leaving the premises of the carpark of the business (as it happens at the Countdown in New Brighton).	Phillipstown Community Centre Charitable Trust
Yes. This is an issue that has been brought to us by local residents and continues to be an issue in some areas despite our attempts to work with commercial businesses.	Waipapa Papanui-Innes-Central Community Board
Yes. Supermarket trolleys - I think people take trolleys home because they don't have transport and/or it's hard to carry a lot of shopping. In Dunedin the supermarket closest to the student quarter has trolleys shoppers can use to take their groceries home. A person is employed to pick up the trolleys the next day, using a van. That seems like a simple way to meet people's needs and return trolleys to the supermarket.	49777
Yes. I think supermarkets need to be required to collect trolleys. More needs to be done to make supermarkets responsible for collecting them, fixing them if necessary and putting them back into use. A huge waste of resources if this is not done.	49715
Yes. why don't Supermarkets put a lock on the trolleys so they cannot go out of the car park?	49625
Yes. We continually have shopping trolleys left outside of our property, it is quite frustrating. Most likely not a council problem, but why not charge the shopping trolley owners for abandoned trolleys on public land. Encouraging them to put in place measures that prevent the removal of the trolleys from their premises in the first place.	49623
Yes. Owners of the trolleys should be expected to collect them within 48 hours of being notified. There needs to be an option to escalate the report to CCC if the initial direct report is ignored.	49620
Yes. This is supermarkets problem though... don't use rates payers money for this matter	49606
Yes. Not only are shopping trolleys an issue on public land, so is everyone's rubbish and furniture that they can't be bothered dumping. It makes the street look so feral with everyone's rubbish left on the streets outside their properties	49604
Yes. If they're on left on public land then there is an issue. It's not an issue I've noticed in our community as such.	49619
Yes. Supermarkets etc need to take the responsibility for preventing this. I understand that neither chain wants to be the first to tighten up - for example by using a coin-operated deposit scheme as seen in airports and many other places overseas. In one short cul-de-sac (Kipling PL) I noted 5 trolleys last Wednesday. Reporting via Snap-Send-Solve only works sometimes.	59590
No. Not sure how the shopping trolley issue would be addressed! I think it is part of a wider social issue. This problem is exacerbated by abandoned shopping trolleys (though not usually on my street) and scooters parked in the middle of footpaths	49691
No. Shopping trolleys are always everywhere. It's frustrating having to report them, however the root cause is people not having any other options of getting their groceries or large items home. So while it's annoying, I don't want any action made against those who dump the trolleys as the majority do so because they have little or no other option. Not sure what this has to do with the water management changes though, don't see anything in the new document.	49637
No. Shopping Trolleys: The Board has not heard a lot about this issue in our area. In the first instance, the Board suggests that a pragmatic solution could be to raise awareness that abandoned shopping trolleys can be reported using Snap Send Solve. We still meet a lot of residents who are unaware of this tool.	Waimāero Fendalton-Waimairi-Harewood Community Board

Memos

Christchurch
City Council 

Memo

Date: 22 May 2023
From: Ruth Littlewood, Senior Policy Analyst,
To: Hearing Panel
Cc:
Reference: 23/783924

Background information for the Hearing Panel: Shopping trolleys on public land

1. Purpose of this Memo

- 1.1 To provide the members of the Hearing panel with background information on the development of the draft bylaw to assist with their consideration of submissions on the topic: "Are shopping trolleys on public land an issue that needs to be further addressed?"
- 1.2 The information in this memo is not confidential and can be made public.

2. Bylaw development and staff consideration of a 'shopping trolley' clause.

- 2.1 During 2021 when staff engaged with community boards on the review of the waste management bylaws, an issue raised by elected members on the Waikura Central-Linwood Community Board were the problems created by shopping trolleys abandoned by shoppers in public spaces. Elected members were concerned that abandoned shopping trolleys unduly impacted on local amenity, obstructed public places and that trolley owners did not reclaim the shopping trolleys within an appropriate timeframe.
- 2.2 These concerns were taken on board by staff developing and refining the draft bylaw clauses and in 2021/2022, they reviewed the practice of other councils across the country and consulted colleagues in other local authorities. They identified that two councils (Auckland and Marlborough) included abandoned shopping trolleys in their waste bylaws.
- 2.3 Staff sought information from other councils on how they dealt with the problems created by abandoned shopping trolleys. With the exception of Auckland and Marlborough, New Zealand councils used non-regulatory methods to deal with abandoned shopping trolleys. Staff from the councils contacted, reported that shopping trolley issues tended to be intermittent, so that an ongoing effort was required to address these problems.
- 2.4 Staff reviewed both the Auckland and Marlborough bylaws and concluded a clause modelled on the Auckland bylaw (**Attachment**) provided a potential bylaw solution.
- 2.5 Staff then further assessed such a clause in terms of its alignment with the purposes of our draft bylaw, its likely effectiveness, potential legal implications and the likely costs and benefits of the clause in terms of administration, monitoring and compliance. This further analysis identified a number of problems with including a shopping trolley clause.
- 2.6 Currently the Council takes a non-regulatory approach to this issue, promoting the Snap-Send-Solve app which is widely used. Overall, staff assessed that the non-regulatory approach as generally effective and has the advantage that it does not require the Council to get

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Memos



involved in managing a third party's assets. The staff assessment was that the problems of abandoned shopping trolleys were unlikely to be solved by a bylaw and that where a bylaw solution was adopted, on-going non-regulatory approaches would still be required. This raises resource implications, if Council were to adopt a regulatory approach.

- 2.7 In considering the draft bylaw clause (**Attachment**), staff noted that its rules apply (predominantly) to the owner of the trolley and that such a clause could create the perception of an unfair regulation which targets the trolley owner rather than the person responsible for taking the trolley (without the owners' permission) and abandoning it. Possible unintended consequences of the clause also considered by staff included the potential for shoppers not to return trolleys but rather rely on the bylaw requirement for the owners to retrieve their trolleys, potentially exacerbating the existing numbers of abandoned trolleys. Staff were also concerned at the resources required to implement a new system and enforce compliance.
- 2.8 Members of staff spoke to Auckland Council staff who generally supported their bylaw clause and were positive about the ability to invoice the trolley owner/retailer for costs incurred by the council. However the Auckland Council staff were not able to provide data on the overall efficiency and effectiveness of their bylaw. Ongoing media reports of significant numbers of abandoned trolleys in areas of Auckland suggested to our staff that a bylaw offered only a partial solution, at best. Staff analysis therefore concluded that the likely ineffectiveness of a bylaw solution did not justify the very significant resource implications of introducing, implementing and enforcing a new system given the Council's very constrained resources.
- 2.9 The conclusion of the staff working party was that a bylaw solution is a potentially expensive tool that would be relatively ineffective, so therefore did not recommend this option for inclusion in the draft bylaw given the Council's other, very pressing waste management and minimisation priorities and work programmes.

3. Conclusion

- 3.1 That the information in this memo is taken into account in consideration of submissions on the question: "Are shopping trolleys on public land an issue that needs to be further addressed?"

Attachments Ngā Tāpirihanga

No.	Title	Reference	Page
A	Draft Shopping Trolley Bylaw Clause	23/783582	

Signatories Ngā Kaiwaitohu

Author	Ruth Littlewood - Senior Policy Analyst
Approved By	Ged Clink - Manager Resource Recovery Lynette Ellis - Head of Transport & Waste Management

Draft clause considered by staff working party:

24. A person must minimise potential for a shopping trolley to become waste

- 1) Subclauses (2) and (3) do not apply –
 - (a) to a person who is a party to an accord about shopping trolleys –
 - (i) if the accord has been approved by council;
 - (ii) to the extent specified in the accord; and
 - (b) to a person who has permission to remove a shopping trolley from the business premises for operational reasons (for example replacement or repair) from a person who is responsible for the operation of a business that provides shopping trolleys;
 - or (c) to a business that provides less than 10 shopping trolleys.

- (2) A person who is responsible for the operation of a business must –
 - (a) clearly display the contact details of the business on every shopping trolley provided by that business for public use;
 - (b) clearly display signage on the premises of that business that –
 - (i) prohibits the removal of any shopping trolley from the premises;
 - (ii) provides the contact details of the business;
 - (iii) encourages the public to report the removal or location of any shopping trolley removed from the premises using the contact details of the business;

 - (c) retrieve any shopping trolley provided by that business for public use that has been removed from the business's premises –
 - (i) within **two?/ 24? hours** of being notified by any person of the location of the shopping trolley;
 - (ii) appropriately dispose of anything found in that shopping trolley;

 - (d) reimburse council for the costs incurred by council to retrieve and return or dispose of any shopping trolley of the business not on the premises of the business, within one month of the trolley's retrieval, if
 - (i) council has notified the person of the location of that shopping trolley;
 - (ii) that shopping trolley has not been retrieved within 24 hours of being notified of the shopping trolley's location;
 - (e) keep, maintain and provide council with an annual record by 31 March every year of the number of shopping trolleys removed from the premises, and retrieved by the business or returned by council or other persons to the business.

- (3) A person who uses a shopping trolley for whatever reason (for example a customer) must not remove that shopping trolley from the premises of the business for which it is provided.

5. Draft Waste Management and Minimisation Bylaw 2023 - Volume of Submissions

Reference / Te Tohutoro: 23/1241303

Report of / Te Pou Cathy Harlow, Democratic Services Advisor,
Matua: cathy.harlow@ccc.govt.nz

1. Purpose Te Pūtake Pūrongo





- 1.1 The purpose of this report is to provide the Hearings Panel with:
 - 1.1.1 All submissions received on the Draft Waste Management and Minimisation Bylaw 2023 Consultation; and
 - 1.1.2 A schedule of submitters who wish to speak to their submission during the Hearings.
- 1.2 **Attachment A** contains the volume of submissions.
- 1.3 **Attachment B** contains a schedule of submitters who will speak to their submission during the Hearing (in speaking order).
- 1.4 Note, that the Local Government Act 2002 requires, as one of the principles of consultation, that “the views presented to the local authority should be received by the local authority with an open mind and should be given by the local authority, in making a decision, due consideration” (section 82(1)(e)).
- 1.5 When deliberating on submissions, the Hearings Panel should keep in mind the Council’s decision-making powers and the scope of the consultation materials. Significant changes from the original proposals may require further consultation.

2. Officer Recommendations Ngā Tūtohu

That the Bylaw Hearings Panel:

1. Receives the written submissions, including any late submissions, received on the Draft Waste Management and Minimisation Bylaw 2023 Consultation.

Attachments Ngā Tāpirihanga

No.	Title	Reference	Page
A  	Volume of submissions	23/1262680	34
B  	Schedule of submitters	23/1262686	73

Submission Table – Draft Waste Management and Minimisation Bylaw, 2023

Would like to speak to the Hearing Panel

Community Boards

ID	Support proposed changes	Shopping trolleys need addressing?	Comments	I would like to speak	Name Organisation Role
49925	Yes, in part - see comments below	Yes	Please refer to our attached submission.	Yes	Emma Norrish Waipapa Papanui-Innes-Central Community Board Chairperson
50053	Yes, in part - see comments below	No	<p>1. The Board has concerns regarding the impact of clauses 21 and 22, the proportionality of potential enforcement measures, and the delegations to the CEO to change regulations under the by-law.</p> <p>2. Clause 21 (1) reads: No person may deposit, cause, permit or authorise the deposit of any unaddressed mail or advertising material in any letterbox which is clearly marked “no circulars”, “no junk mail”, “addressed mail only” or with words of similar effect, (a) Around or near any such letterbox or associated vehicle access-way; (b) On any vehicle parked in a public place; or (c) in a letterbox that is already full of mail and/or advertising materials.</p> <p>3. The definition of advertising material is: Advertising material means any message which: (a) has printed content controlled directly or indirectly by the advertiser; and (b) is expressed in any language and communicated in any medium with the intent to influence the choice, opinion or behaviour of a person. Explanatory Note: Advertising material includes material such as circulars, leaflets, flyers, brochures, business cards, samples and clothing donation bags.</p> <p>4. When coupled with clause 26, an individual could be fined \$20,000 for breaching this, which seems excessive. It could have a chilling effect on civic discourse, for instance what happens if everyone has one of those signs? They consultation documents there's no Bill of Rights Act (BORA) impacts, but section 14 of BORA says: "Everyone has the right to freedom of expression, including the freedom to seek, receive, and impart information and opinions of any kind in any form."</p> <p>5. The Board questions how postal communications from the Council, such as flyers, would be covered should this proposal be adopted. E.g. Start Work Notices etc.</p> <p>6. Clause 22 (1), No person may: (a)Allow any accumulation of waste on any premises they own, occupy or manage to become offensive, a nuisance or likely to be injurious to health; or (b)Use an approved receptacle in a manner that creates a nuisance, is offensive or is likely to be injurious to health.</p> <p>7. When coupled with clause 26, this could see impoverished and unwell people further marginalised. It also creates room for malicious and vexatious complaints from neighbours. The Board are concerned about people who are without financial or psychosocial resources being mistreated.</p> <p>8. Taking a trailer-load of rubbish to the dump is not within everyone's capability or resources, if the Council going to have the "stick" then we need to provide some kind of hard rubbish collection/service for people who are in need (at least).</p> <p>9. The Board asks how will the Council address the significant equity issues surrounding how to deal with waste?</p> <p>10. The Board would like the principle of proportionality with regard to any enforcement measures to be explicitly stated in the by-law.</p> <p>11. The Board suggests under the draft terms and conditions for kerbside collections and community collections points, that the “CEO may with agreement of the full Council, or relevant committee” make changes.</p>	Yes	Paul McMahan Waitai Coastal-Burwood-Linwood Community Board Chairperson

Submission Table – Draft Waste Management and Minimisation Bylaw, 2023

Groups / Organisations

ID	Support proposed changes	Shopping trolleys need addressing?	Comments	I would like to speak	Name Organisation Role
50074	Yes, in part - see comments below	No	<p>I write as someone active in my own community, as Chair of the Halswell Community Project and as an employee of Manuka Cottage Addington Community House which puts out the Addington Times every month. I am also a local resident with “no circulars” on my letterbox.</p> <p>I am particularly writing about the following on p.15: Unaddressed mail and advertising material</p> <p>(1) No person may deposit, cause, permit or authorise the deposit of any unaddressed mail or advertising material in any letterbox which is clearly marked “no circulars”, “no junk mail”, “addressed mail only” or with words of similar effect, (a) Around or near any such letterbox or associated vehicle access-way; (b) On any vehicle parked in a public place; or (c) in a letterbox that is already full of mail and/or advertising materials</p> <p>Overall, I applaud any action to minimise waste and I have a “no circulars” notice on my letterbox to avoid the regular weekly letterbox drops of advertising material that go straight into my recycling bin. However, it is important to me personally that my local neighbourhood association is allowed to put their infrequent, black and white half page newsletters into my letterbox as a way of letting our whole community know about local issues and events.</p> <p>As an employee of Manuka Cottage, I am involved with putting the Addington Times out into Addington every month. We put out around 3000 of these. We ask our volunteer deliverers not to put the mail into boxes that say addressed mail only or no Addington Times and tell them not to put anything into boxes that are not being cleared. This is written on each newsletter so that people are able to stop receiving them if they don’t want them.</p> <p>At the same time, even this is problematic given that new housing developments put “addressed mail only” onto letterboxes as a matter of course, so we have no way to contact new residents in those developments. We have sought to address this by putting newsletters into these boxes with a letter telling people how they can get hold of our newsletters either online or at local places. This blanket ban will put significant limits on our capacity to keep residents informed and to encourage them to participate in local events and activities. It also represents quite a risk to us given that sometimes the notices on the boxes are quite small or badly placed and it is easy for our volunteers not to see the notice before they put the newsletter in the box. In Addington, there are many who are not easily able to get online regularly, if at all. Letterboxing, therefore if quite important</p> <p>Likewise, the Halswell Community Project runs events and local activities and puts out newsletters in relatively small numbers, each month as a means of trying to contact those who are lonely and who don’t have an internet connection. In Halswell our online connectivity is very high and so mostly we work online and use email to distribute notices. However, those who cannot get online often are older, less well off people who struggle to use devices of any sort and may also be those most in need of community activities. Another situation where it needs to be legal to do letterbox drops into every box is for small neighbourhood events such as local barbeques or street parties. As I noted above this is important in my neighbourhood but there are many like this around the City and potentially (hopefully) there will be many more. Occasionally we want to be able to put things in letterboxes without fear of breaking the law.</p> <p>I would have thought also that council itself would have times when they want to be able to put unaddressed things into letterboxes beyond the few that are not labelled in some way – eg as they did at times after the earthquakes.</p> <p>A blanket ban on putting unaddressed mail into letterboxes with any kind of label will potentially throw the baby out with the bathwater. You could make an exception for community notices and newsletters and that would probably cover these scenarios.</p>	Yes	Chrys Horn Halswell Community Project Manuka Cottage Addington Community House Chair/ Employee
50065	Yes, in part - see comments below	Yes	<p>CRRRA Inc is TOTALLY OPPOSED to having the ability for residential properties to opt out and not pay for kerbside collection services. We know what will happen:</p> <ol style="list-style-type: none"> 1. Some residents will opt out and then try to put their rubbish in other people's bins overfilling the bins and then those bins may not be collected, 2. Some residents will opt out and just dump their rubbish on the side of the road, 3. There are some appallingly greedy landlords who will opt out and their tenants will be without bins and then what do the tenants do with their rubbish (two thirds of residents in our area are tenants or in Airbnb properties), 4. After opting out some unscrupulous residents may steal another person's bin and keep it out of sight on their property. 5. A resident who returns their bins decides to sell the house and the new owner is faced with the prospect of having to buy bins. 	Yes	G Wilson Central Riccarton Residents' Association Inc Secretary

Submission Table – Draft Waste Management and Minimisation Bylaw, 2023

ID	Support proposed changes	Shopping trolleys need addressing?	Comments	I would like to speak	Name Organisation Role
			<p>The dumping of rubbish on the side of the road is a problem NOW. Being allowed to opt out of the bin service for the sake of a reduction in rates is a RECIPE FOR DISASTER - socially and environmentally.</p> <p>There should NOT BE ANY REDUCTION IN RATES for not putting a bin out for collection.</p> <p>Residents can be encouraged by council not to put each bin out when there is only a small amount of waste in it but to wait for the next weekly/fortnightly collection. Result: faster collections for the drivers, fewer trips to landfill and a saving in fuel.</p> <p>Current irksome matters: 1. We know it is a difficult job being a driver especially in narrow streets with cars parked nose to tail on each side of the street BUT it is really annoying when the empty bin lid is left open especially on a rainy day or the bin is dropped on its side and this makes it extremely difficult for people using footpaths with walking frames, mobility scooters, and people pushing prams, prams, wheelchairs, etc 2. There are too many rules confusing residents about what should/should not go into yellow bins. For example, the recycling plant should have the technology to receive ALL plastic containers. Also the recycling plant should have the technology whereby all glass jars can be washed clean in the plant and the same for cans which have contained food - for example salmon , mackerel - which are very hard to clean at home. If council cuts out the finickity rules, there will be a much greater uptake of the yellow bins.</p>		
49991	Yes, in part - see comments below	No	The current bylaw holds a wish-wash definition of cleanfill and should be better defined to assist with the development of land. New Zealand is currently the second largest contributor of landfill waste in the world, with over 50% of that waste made up of soil. Canterbury holds an array of soil types all with differing background levels, and the recent changes to foundational requirements for buildings has resulted in significant increases in soil disposal volumes, which often cripple the redevelopment of residential properties. Not to mention, without a clear understanding of Asbestos in Soil there is no cheap way to get rid of soil containing the natural mineral, asbestos. The bylaw should better outline what is cleanfill, and include a clear understanding of the rules around asbestos, as virgin excavated natural material could also include natural deposits of asbestos minerals.	Yes	Sari Eru EINZ Ltd. Director
50124	No		See attached submission	Yes	Jacqui Hewson Winstone Wallboards Limited Senior Consultant
50033	Yes, in part - see comments below	Yes	<p>21. Unaddressed mail and advertising material There has never been clarity around whether the flyers and newsletters delivered by community organisations and residents/neighbourhood associations are to be considered "junk mail". We have received mixed feedback from residents: some of our people complain that they do not receive our communication as they do not consider we, as community organisation, are included in the ban covered by their "addressed mail only" sticker. When by mistake, one of our volunteers delivered flyers to one of the big complexes in the neighbourhood (covered by a blanket ban for advertising material), our staff received a quite rude phone call from the property manager intimating the PCCCT to remove all the flyers form the letterboxes. To avoid complaints, we have developed a PoP sticker (People of Phillipstown) that communicates to our volunteers that in that house flyers and newsletters from the PCCCT are welcomed despite the "no junk mail" letter on the letter box. We have noticed that our community is more reachable with physical flyers and advisement rather than on line (limited access to internet, limited IT literacy). Not being able to cover the whole neighbourhood with our communications limit the impact of our services (especially when we organise Community Conversations around issues in the neighbourhood). Moreover, Clause 26 prescribes a very onerous penalty that in our opinion exceeds the seriousness of the behaviour.</p> <p>The review of the bylaw offers the opportunity to clarify what unaddressed mail and advertising material is and the possible exceptions. We support the proposal of Clause 21 to be amended to provide exclusions for materials such as public notices, local community newsletters, notices of public meetings; charitable media.</p> <p>Regarding shopping trolleys, we consider that they should be owners' responsibility and the nuisance caused by them being abandoned (even on the cycle lanes!) should be clearly addressed by Council. If requesting that owners recollect them is not effective, then other options should be considered, as for instance: providing a chip that block the wheels when leaving the premises of the carpark of the business (as it happens at the Countdown in New Brighton).</p>	Yes	Viviana Zanetti Phillipstown Community Centre Charitable Trust Manager

Submission Table – Draft Waste Management and Minimisation Bylaw, 2023

Individuals

ID	Support proposed changes	Shopping trolleys need addressing?	Comments	I would like to speak	Name Organisation Role
50071	Yes, in part - see comments below	Yes	<p>My submission refers to two matters:</p> <ul style="list-style-type: none"> - Unaddressed Mail (Clause 21) - Kerbside dumping (of items like mattresses and couches) <p>UNADDRESSED MAIL I refer to Clause 21 of the draft bylaw, which introduces restrictions on unaddressed mail or advertising materials, and reads: "21. Unaddressed mail and advertising material (1) No person may deposit, cause, permit or authorise the deposit of any unaddressed mail or advertising material in any letterbox which is clearly marked "no circulars", "no junk mail", "addressed mail only" or with words of similar effect, (a) Around or near any such letterbox or associated vehicle access-way; (b) On any vehicle parked in a public place; or (c) in a letterbox that is already full of mail and/or advertising materials." I think the Clause has good intent, and I particularly support sub-clauses (a), (b) and (c) that no material be placed around letterboxes, on vehicles, or into letterboxes that are already chocked full. However, I want to comment on two things and conclude that there should be an exemption to the bylaw for certain types of notices. Commercial distributors already avoid letterboxes marked "no circulars", "no junk mail", unaddressed mail only" and other similar wording I have had such labels on my Christchurch letterbox for 20 years and the amount of unaddressed mail received has been minor. The amount of commercial unaddressed mail or advertising has been miniscule. The occasional flyer that slips through tends to be small and very local in nature. For a similar length of time I have delivered community newsletters to hundreds of houses every month and noted that the commercial deliverers deliver to unmarked letterboxes only. I can think of two reasons for this: - Smart marketers understand the value of targeting, and therefore deliver to only those households who are open to their message. - The larger distributors adhere to a National Code of Practice for the Distribution of Unaddressed Mail developed with the Marketing Association. Thus, the Clause addresses a problem - unaddressed mail landing into letterboxes with markings - that does not seem to be significant (apart from issues quite appropriately addressed in subclauses (a), (b) and (c)). As written, the bylaw has no exclusions and it bans (among other things): public notices from Government, local bodies and NZ Post; election material; public notices; local community newsletters; notices of public meetings; charitable media; the City Council's own notices including street works notices; census notices; and neighbour's lost pets notices. Letterbox distribution is an important societal mechanism for each of these sorts of notice. INCLUSIVE: For community related communications letterboxes are the only viable communication channel to reach all households regardless of age, cultural background, technology and online presence. This is particularly important in this age of fractionalised media. ENGAGEMENT: In a well functioning democracy it is important that all residents have the opportunity to be made aware of their opportunity to participate in democratic processes, public consultations and community narrative. RESILIENCE: Many Residents Associations rely upon letterbox distribution to all households in their neighbourhoods to build community and resilience, and with a comparatively small amount of paper. The removal of this communication channel could have a serious adverse effect in the long term capacity and community building aspects that these associations foster. It is a critical communication vehicle during serious events like earthquakes, weather and pandemic when electronic media is under heavy load or experiencing outage. My submission recommends that Clause 21 be amended to provide exclusions for the types of materials I have outlined in (2) above. Reference sources may include the Marketing Association National Code of Practice (https://marketing.org.nz/resource-hub/code-of-practice-unaddressed-mail) and the Auckland City Council Waste Management and Minimisation Bylaw 2019 (Clause 18) (https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/bylaws/docs/wasteminmgmtbylaw/waste-management-minimisation-bylaw-2019.pdf)</p> <p>KERBSIDE DUMPING I would like to see the Bylaw specifically address an issue or great concern to many neighbourhoods across Christchurch, and I cannot find it mentioned in the Draft Bylaw.</p>	Yes	John Miller

Submission Table – Draft Waste Management and Minimisation Bylaw, 2023

ID	Support proposed changes	Shopping trolleys need addressing?	Comments	I would like to speak	Name Organisation Role
			<p>The practice of putting unwanted household items like mattresses and couches onto the footpath is vexing for many residents. Research done by the Inner City Revitalisation Working Group (of which I was a member) revealed it is an extremely high neighbourhood frustration.</p> <p>The Inner City East work revealed that the phenomenon is borne from (a) some people think it is acceptable to do this, (b) seeing other people doing it reinforces this view, and (c) it can be difficult to dispose of these items if the householder lacks budget and/or transport to do so.</p> <p>I think that in fairness to all members of the public (including those mentioned in (a) above), we need to be explicit that it's not cool to be doing this. I do understand the recycling ethos that may lead to some thinking it's OK, but a lot of the stuff that goes out is rain-sodden rubbish.</p> <p>Aside from the Bylaw, there are potential initiatives that can inform, educate, and provide disposal alternatives to help reduce the practice. However I think we should not miss this golden opportunity to provide clear disincentivisation by providing for it in the bylaw. I note that this practice appears to be a breach of the Litter Act 1979 (Section 15), and that the Act provides territorial authorities the ability to make bylaws and power to adopt infringement notices under same Act. I am not aware of the legislation being exercised locally.</p>		

Submission Table – Draft Waste Management and Minimisation Bylaw, 2023

No longer wishes to speak to Hearing Panel

Community Board

ID	Support proposed changes	Shopping trolleys need addressing?	Comments	I would like to speak	Name Organisation Role
50010	Yes, in part - see comments below	No	<p>The Board thanks the Council for the opportunity to submit on the Draft Waste Management and Minimisation Bylaw 2023. The Board supports the proposal to merge the two previous bylaws into one document, this will make the regulations easier to access and also reduce the cost of future bylaw reviews.</p> <p>The Board submitted its concerns about allowing residents to opt out of the kerbside collection service during the Annual Plan consultation. The Board continues to have reservations about allowing residents to opt out of the service. Council services are provided for the benefit of everyone and should be operated very cost effectively. We have concerns about the long term impact on our communities if we move to a user-pays model and begin eroding the economies of scale for these services. If other providers are able to provide these services more cost-effectively than the Council, the Council should be learning from their example to improve our service rather than allowing residents to opt-out. For apartment buildings, the Board recognises that having separate bins for each apartment can cause problems but suggests that a better solution would be for the building to have a central waste management point which can be serviced by the Council contractor, rather than opting out of the service altogether. It is the Board's view that residents should be using the Council kerbside collection service unless there are genuine reasons why it would be unreasonable or impractical for the Council contractor to access the site.</p> <p>The Board encourages the Council to continue to consider ways to incentivise residents and businesses to manage waste more sustainably. The Board has a particular concern about green waste for businesses, and would support the Council exploring initiatives to make it easier for businesses to manage their green waste sustainably.</p> <p>The Board encourages the Council to provide more information to the community on what to do with plastics that cannot be put in the yellow bins, for example bottle caps, soft plastics and bread ties. The Board feels there is an unmet need for services or information on how to manage these items sustainably, and an opportunity to collaborate with organisations who want to find solutions.</p> <p>The Board is experiencing issues with charity clothing bins and has discovered that there is currently no policy or regulation to manage where they are placed. The Board sees this as a gap that needs to be addressed immediately. At present there is no redress if a bin owner does not manage issues to do with their bin including noise and litter, and also no controls around where bins are placed or how many can be placed there. The Board believes the Council needs to introduce rules to manage this. The Board is fully supportive of charity clothing bins, but they need careful management to ensure they are in the right place and do not create a nuisance.</p> <p>Shopping Trolleys: The Board has not heard a lot about this issue in our area. In the first instance, the Board suggests that a pragmatic solution could be to raise awareness that abandoned shopping trolleys can be reported using Snap Send Solve. We still meet a lot of residents who are unaware of this tool.</p>	No longer wishes to be heard	Linda Chen Waimāero Fendalton- Waimairi-Harewood Community Board Deputy Chair of Submissions Committee

Groups / Organisations

ID	Support proposed changes	Shopping trolleys need addressing?	Comments	I would like to speak	Name Organisation Role
50075	Yes, in part - see comments below	No	<p>Draft CCC Waste Management and Minimisation Bylaw</p> <p>Comments from Teddington Quarry Ltd Teddington Quarry has for some time operated a small cleanfill at the head of Lyttelton Harbour which has served the local area. This has been licenced by the CCC These comments are only about the cleanfill aspect of the bylaw. We understand the changes are being made to bring the waste operations in line with implementation of recent changes to the Waste Minimisation Act (WMA). This is adding another layer of complexity and cost to the operation and it is assumed that present operators</p>	No longer wishes to be heard	Joan Blatchford Teddington Quarry Ltd Director

Submission Table – Draft Waste Management and Minimisation Bylaw, 2023

ID	Support proposed changes	Shopping trolleys need addressing?	Comments	I would like to speak	Name Organisation Role
			<p>will be reviewing what fill they take in line with the Act and the reporting and monitoring regime which is being implemented by the Ministry of the Environment (MOE). The Council for clarity needs to line up their definitions with the disposal classes set out in the Waste Minimisation Act and regulations i.e Landfill classes 1 – 5 as operators will now be working with the WMA and the new bylaw. The definitions need to clearly link back to the DOE classes. We have some general comments to make: To date the bylaw governing cleanfills has been very clear, but with the move to an omnibus bylaw, that clarity is lost. When looking at the administration requirements for operators:</p> <ul style="list-style-type: none"> Thought should be given to scale linked to the classes i.e Class 1 is very complex but Class 5 simple... The reporting requirements should line up with those of the DOE to avoid duplication. Fees and charges, should also take account of the scale and complexity of the operation. <p>In the Statement of Proposal p3, it states that one of the main changes is that “it will allow the Chief Executive to make changes to terms and conditions”. There needs to be clarity about which “terms and conditions” in the bylaw that this refers to. Monitoring – given that both the Ministry for the Environment and the CCC will be monitoring the same site and for similar things, then I would urge the Council to enter discussions with the MOE to establish a single cost effective physical monitoring process and for one organisation to take responsibility. The changes to the ACT will increase the cost to users and operators so the industry will be scrutinising with interest increases in the costs of administration and monitoring. Cooperation between the City Council, Environment Canterbury and The MOE should be encouraged as all three organisation have an interest in waste.</p>		
50037	Yes, in part - see comments below	Yes	<p>AGREE (i) with replacing the current two bylaws with one consolidated bylaw (ii) with providing a wider range of bin options, including being able to opt out (iii) that the variety of services is appropriate and adequate (iv) that additional provisions for multi-unit residential developments are needed (see SUGGESTIONS below) and (v) that ways to decrease amount of unaddressed mail and nuisance/litter are needed (see SUGGESTIONS below).</p> <p>SUGGESTIONS</p> <p>Clause 10 (Multi-unit developments): The recommended additions to the Bylaw are insufficient in cases where the multi-units are being used for unhosted short term/Airbnb rentals. Visitors often do not know (or don't care) what the various bins are to be used for, what can be recycled and when to put which bin out. Many unit owners are absentee landlords and property managers are not hands on enough to ensure rubbish is handled properly. SUGGEST that this be covered by appropriate addition to the Bylaw, but unsure what would be appropriate wording, sanctions or requirements.</p> <p>Clause 21 (Unaddressed mail): Current ways of reducing unwanted advertising material/circulars seems to be working. AGREE with (a) (b) and (c) of this clause. HOWEVER, there are some exemptions that need to be catered for; in particular, notices from the recognised Residents' Association in each area. Communications for new residents or ones not on formal contact (email) contact lists are often distributed through letterboxes. There could be a requirement that such communications MUST include the Association's contact details, to be used if a resident wants to opt out of receiving future notices.</p> <p>Clause 22 (Nuisance & litter): Agree with this clause, but it needs to specifically address problems arising from residents dumping large items (sofas, chairs, mattresses etc), rather than taking them appropriately through a recycling centre or Transfer Station. Unless the dumped items are on a public space (footpath, street), our understanding is that CCC cannot remove them if contacted. We do appreciate, however, that if the dumped items ARE collected if a complaint is made, that can encourage more people to dump with abandon!</p>	No longer wishes to be heard	Marjorie Manthei Victoria Neighbourhood Association Membership Coordinator & Contact Person

Submission Table – Draft Waste Management and Minimisation Bylaw, 2023

Individuals

ID	Support proposed changes	Shopping trolleys need addressing?	Comments	I would like to speak	Name Organisation Role
49742	Yes	Yes	We are keen gardner's and elderly., we grow our own fruit and veg but due to age unable to make compost or take garden waste to the council tip. Our recycling waste in comparison to our garden waste is much less. We need a larger Green bin and smaller Yellow bin BUT do not believe we should have to pay the exorbitant fee of \$194 required by Council on a YEARLY basis for a bigger Green bin. Council should encourage ratepayers to grow gardens and NOT PENALISE them. Please make larger bins available free of charge to whoever needs them. Freda Dozell	No longer wishes to be heard	Freda Dozell
49600	No	Yes	Well I support the use regulations of waste collection the current system isn't working. Flagging individual bins because of contamination and not emptying them untill the next bin cycle causes residents to use the red bins. Checking and removing once items have been collected supports reduction or landfill and employment in waste industry. No solutions are given when your bin is not emptied because of contamination, just that the policy dictates that the bin does not get emptied. Suggestions to buy expensive bin lock attachments or to take my recycling and green waste and dispose of it myself is not helpful because I do not have the time or funds to be making weekly trips for a service that is already meant to be in place. I have had my yellow bin flagged for two cycles in a row due to passersby putting contaminated items like dog pop bags/clothing/rubbish/drug paraphernalia in my yellow or green bins. I live in an area with high levels of foot traffic so often get trash thrown in what ever bin is out waiting to be collected/or in my hedge causing further back log of rubbish to be collected. I have emailed the Linwood area CCC rep with no response and spoken to the waste company about it a number of times. I now consider the only realistic option to me is to put everything in the red bin to save the hassle, a choice I'm not pleased with because I want to do my part in teaching my children to be green friendly humans by keeping landfill to a minimum.	No longer wishes to be heard	Alicia Boniface
49980	Yes, in part - see comments below	No	I am a mother of four children and live in a 6 bed house, next door to a few families and single owner occupier homes, we all have the same red bin, on top of this I have three special needs children who create a lot more waste than a typically developing child. Our needs are not meet in the current system of a one size (literally) approach to all the bin allocations. The council needs to understand that some flexibility in allocation must be implemented to create fair and equitable society that acknowledges the unique needs of each household, rather than putting additional stress on families.	No longer wishes to be heard	Racheal Priestley
50040	Yes, in part - see comments below	Yes	I support the Draft Bylaw in principle and attach a document outlining my comments on illegal dumping, education, community initiatives, unaddressed mail and shopping trolleys in relation to the Bylaw.	No longer wishes to be heard	Marie Byrne

Submission Table – Draft Waste Management and Minimisation Bylaw, 2023

Does not wish to speak to Hearing Panel

Community Board

ID	Support proposed changes	Shopping trolleys need addressing?	Comments	I would like to speak	Name Organisation Role
50052	Yes, in part - see comments below	No	See attached submission	No	Waipuna Halswell Hornby Riccarton Community Board Community Board Adviser

Groups / Organisations

ID	Support proposed changes	Shopping trolleys need addressing?	Comments	I would like to speak	Name Organisation Role
49704	Yes	Yes	Please see attached document for our notes	No	Anthea Madill Remix Plastic & Sustained Fun Limited Owner
49857	Yes		See attached submission	No	Cassie Welch Te Mana Ora on behalf of Te Whatu Ora and the National Public Health Service Policy Advisor
49812	Yes, in part - see comments below	No	<p>This submission comes from Keith Norris, A compliance and privacy consultant working with large organisations, charities, local Councils and Government departments. I am the originator and author of the National Code of Practice for Unaddressed Mail. A copy of the current code is attached.</p> <p>This code was developed in conjunction with Rodney, Franklin and Auckland councils, specifically working with their waste management departments to develop appropriate waste management Bylaws. Many other local councils have now used the code as the basis of their Bylaw.</p> <p>The basic principle of the code is to allow the householder to control the contents of their letterbox. I believe that clause 21 in your proposed Bylaw achieves that purpose to a degree in that it controls promotional mail (junk mail), but fails to allow for the rights of community newsletters, charities and even local government to communicate with householders.</p> <p>I therefore submit that the following sub-clauses be inserted in Clause 21.</p> <p>Unaddressed mail must not be delivered to a letterbox displaying the following signs: 2.2 'Addressed Mail Only'...n.b.: Public notices from Government or Local Bodies and Election material are permitted. 2.3 'Addressed Mail and Newspapers Only'...n.b.: Free print media, public notices and election material are permitted. 2.4 'No Junk Mail, No Circulars'...n.b.: Local community newspapers/magazines, charitable media, public notices and Election material are permitted.</p> <p>I am available to discuss these proposed amendments via email or phone [REDACTED] during normal business hours. Thank you for the opportunity to submit.</p>	No	Keith Norris The New Zealand Marketing Association Compliance Consultant
50013	Yes, in part - see comments below	No	The community of Wainui, Banks Peninsula, represented by the Wainui Residents Association, appreciates the opportunity to comment on the Draft Waste Management and Minimisation Bylaw 2023. We are a small rural community of approximately 250 properties, with	No	Jan Gregor Wainui Residents Association

Submission Table – Draft Waste Management and Minimisation Bylaw, 2023

ID	Support proposed changes	Shopping trolleys need addressing?	Comments	I would like to speak	Name Organisation Role
			<p>approximately 40 permanent residents. Holiday/second home owners, visitors and day-trippers increase the population ten-fold during weekends and holidays.</p> <p>Our community does not have domestic kerbside rubbish and recycling collection or collection facilities at public reserves. We rely on people taking their waste away and use of the Community Collection Point at Barry's Bay. We support Clause 8 Community Collection Points.</p> <p>With regard to Clause 20 Event Waste Management Plan, Wainui is a location of choice for events such as the Ocean Swim Series and the Canterbury Classic Triathlon. These events typically make use of the Stanbury Reserve and foreshore. Several hundred people are involved in these events, but not the 1000 people trigger point for an event waste management plan mentioned in 20(2). Nonetheless, this number of people concentrated on a small area of environmentally-sensitive reserve and foreshore does present a risk if waste is not managed. Appreciating the need to balance the attractiveness of the location to events, and compliance with rules (bylaw), we ask for consideration of a more flexible trigger number requiring a waste management plan in combination with an additional point 20(2)(c) that considers the environmental sensitivity of the location (including base population of the community and availability of community waste collection facilities).</p>		Committee member

Individuals

ID	Support proposed changes	Shopping trolleys need addressing?	Comments	I would like to speak	Name Organisation Role
50046	Yes, in part - see comments below	No	<p>I would like to see a WIDER range of bin options. To expand what I mean: I'd like to see BETTER options of bin sizes i.e to be able to swap BIG bins for a smaller sized bin Without cost!! At less for persons OVER 65 or with some disability. If you can supply evidence of age, or disability it makes commonsense. Personally, I have no intention of paying anything for an exchange. I DONT need anyone coming to my house put out my bins. Thanks, but I'm to independent. Our rates are HIGH enough. "LISTEN to the PEOPLE".The Council needs to be more practical in these differcult times.</p>	No	Patricia Hampton
50070	Yes, in part - see comments below	Yes	<p>Yes I support most of the parts of the draft Waste and Minimisation Bylaw 2023. The Waste Minimisation Act 2008 and the goal to move to zero waste does not go far enough in order for this Bylaw to be effective. Waste Minimisation supports the waste hierarchy, Product Stewardship and it aims to push NZ towards a circular economy future. Currently we are focused on waste and the minimisation aspect covers a bit of recycling. The parts I would like to make note of are, and if the bylaw covers: - Litter from shop areas, streets with businesses and especially supermarket car parks where litter is found a lot and if they have responsibility to take care of their surroundings. - To have put more recycling bins where there is high volumes of people or influx of people to an area eg beaches in the summer, Lyttelton streets during cruise ship influx and with Sail GP event. (note- on a couple of volunteer rubbish hunt days we found that 40-50% of waste collected from the streets/pavements/fence lines and near and in the stormwater drains were rubbish and recyclables) - Small businesses that use the wheelie bins for recycling and rubbish and are subject to the same "bin good' monitoring and if they get more bins are needed by their business. - Where multi-residential buildings have the option to recycle but instead should be made to recycle as the volumes of recyclables could be sizeable, item #8, hence management be presented with not a waste management but a waste and minimisations plan. - For conditions placed on waste operators and support from them to achieve a WMP, does it include a goal of zero waste. Operators can set out a plan to divert more waste, recycle more items or else aim to seek ways in reducing waste to landfill</p>	No	Cathy Lum-Webb

Submission Table – Draft Waste Management and Minimisation Bylaw, 2023

ID	Support proposed changes	Shopping trolleys need addressing?	Comments	I would like to speak	Name Organisation Role
			<ul style="list-style-type: none"> - Snap Send Solve has been a useful tool to help reduce littering eg when people dump beds and household items by the kerb. Maybe a community creative action to have a kerbside 'put out clean reuseables so people can help themselves. It appears to already be happening but is random and people might be dumping knowing that snap send and solve just gets rid of their items. - Great work and detail of the construction sector regarding sorting, recording data. Additional educational or part of the WMP brief to include eco-alternatives, environmentally friendly products and product stewardship, and impacts on the environment. - Litter at events, in addition to the managing litter a way to reduce litter by NOT having stall holders bring a lot of fliers and eg disposable buntings etc to the event and reduce the items that cannot be recycled eg glad wrap. 		
49733	Yes, in part - see comments below	Yes	<p>I have used the sss app on a number of occasions. However I never seem to get a confirmation and case closed from ccc?</p> <p>there needs to be consideration for the reduction of waste generated by sales from 'fast food' providers. Its obvious from discarded litter, rubbish and waste in rivers and the estuary that fast food wrappers and containers are a significate source of our litter problem.</p>	No	martin wheldon
49621	Yes, in part - see comments below	Yes	Hey team, it would be great if we had a one off opportunity where we could bring our bins in and swap for one that is better sized for our household eg swap little green bin for bigger one or swap large recycling bin for little one for those in single person properties, the idea behind the swap is to cut costs but also reuse bins that are still in sufficient shape	No	Gemma Mathias
49620	Yes, in part - see comments below	Yes	Owners of the trolleys should be expected to collect them within 48 hours of being notified. There needs to be an option to escalate the report to CCC if the initial direct report is ignored.	No	Oli Mould
49615	Yes, in part - see comments below	Yes	Green needs to be large and no extra cost, I thought we were the garden city after all, my green is full every week and have to stuff in the red bin if it's that week. You seriously need to change the green bin, so many people ask for this	No	Robyn White
49614	Yes, in part - see comments below	Yes	We should be able to have any sized bin we require at no extra charge , what else do our rates cover , stuff all , oh wait a stadium half of us didn't think was a priority atm	No	Sarah G
49612	Yes, in part - see comments below	Yes	I pay rates for a larger section I want a green bin that reflects the size of my section.	No	Nikki Duffield
49965	Yes	Yes		No	Patrick Kennedy
49816	Yes	Yes	Can this be an opportunity to manage junk being thrown out/placed on the kerb side - this is becoming an issue in Sydenham	No	Tom Williams
49777	Yes	Yes	<p>I agree with all your proposed changes summarised in points a. to h.</p> <p>I definitely support allowing flexibility in bin options. I encourage you to make changing bins free if households are downsizing. I'm not so sure about allowing households to opt out of collection. Would you require them to have alternative arrangements for dealing with their household waste?</p> <p>Supermarket trolleys - I think people take trolleys home because they don't have transport and/or it's hard to carry a lot of shopping. In Dunedin the supermarket closest to the student quarter has trolleys shoppers can use to take their groceries home. A person is employed to pick up the trolleys the next day, using a van. That seems like a simple way to meet people's needs and return trolleys to the supermarket.</p>	No	Jane Mountier
49732	Yes	Yes		No	Summer McKinnon
49729	Yes	Yes		No	Oana Cotiga
49715	Yes	Yes	Bylaw changes make sense and will lead to better outcomes. I think supermarkets need to be required to collect trollies. More needs to be done to make supermarkets responsible for collecting them, fixing them if necessary and putting them back into use. A huge waste of resources if this is not done.	No	Sarah Pritchett
49625	Yes	Yes	why don't Supermarkets put a lock on the trolleys so they cannot go out of the car park? also is it possible? to have the same size bins instead of three sizes?	No	Louise Ramm

Submission Table – Draft Waste Management and Minimisation Bylaw, 2023

ID	Support proposed changes	Shopping trolleys need addressing?	Comments	I would like to speak	Name Organisation Role
49623	Yes	Yes	We continually have shopping trolleys left outside of our property, it is quite frustrating. Most likely not a council problem, but why not charge the shopping trolley owners for abandoned trolleys on public land. Encouraging them to put in place measures that prevent the removal of the trolleys from their premises in the first place.	No	Martin Scottorn
49622	Yes	Yes		No	Thomas Wood
49619	Yes	Yes	If they're on left on public land then there is an issue. It's not an issue I've noticed in our community as such	No	Nicole Trenwith
49611	Yes	Yes	I really want to be able to get a bigger red bin as we have 4 adults and 2 children in our house	No	Graeme Foster
49607	Yes	Yes	We need bigger bins they are too small.or take the yellow bin every week	No	Sheree Kerr
49605	Yes	Yes	We have a large section of 900m2 and only a tiny green bin. All sections over 500m2 should have a large green bin.	No	Melissa Nevin
49601	Yes	Yes	We should be able to have the same sized bin for each type of bin. Whether that be small R Y G or medium RYG or large RYG	No	Ashley Crook
49599	Yes	Yes	Bins need to be able to be changed for bigger sizes without a surcharge. You want us to recycle and use green waste - give us bigger green bins without the additional charge	No	Rachael Shaw
49598	Yes	Yes	I would love to see a soft plastics bin option as over half of a bins rubbish is soft plastic. With companies like Food stuffs and The Warehouse offering to take these for free, why would we not have the option here too.	No	Benjamin Hubball
49597	Yes	Yes	Rubbish bins should be the same size as the recycling bins some families fill the small one and have Rubbish left over so once the bin is emptied they refill it with what couldn't be placed in it for dumping I think this is where we have Rubbish dumping on the road side	No	Mike9 Mooney
49596	Yes	Yes	Bigger green bins!!!!	No	Jordon Turnbull
49595	Yes	Yes	The green compost bin needs to be bigger for bigger properties, the small bins can't even fit all the lawn clippings of the 6 different lawns we have on our property which includes the kerb lawns, also doesn't include weeding and pruning the gardens that I have to try to put somewhere.	No	Matthew Smith
49594	Yes	Yes	A bigger green bin at no extra charge should be considered	No	Laura Linnane
49592	Yes	Yes	Need larger rubbish and organic bin same size as recycling would be good	No	Sharon Chapman
49590	Yes	Yes	Supermarkets etc need to take the responsibility for preventing this. I understand that neither chain wants to be the first to tighten up - for example by using a coin-operated deposit scheme as seen in airports and many other places overseas. In one short cul-de-sac (Kipling PL) I noted 5 trolleys last Wednesday. Reporting via Snap-Send-Solve only works sometimes.	No	Gordon Findlay
49606	No	Yes	This is supermarkets problem though... don't use rates payers money for this matter	No	Luis Santelices
49604	No	Yes	I should not have to pay more to keep the bins I currently have. Not only are shopping trolleys an issue on public land, so is everyone's rubbish and furniture that they can't be bothered dumping. It makes the street look so feral with everyone's rubbish left on the streets outside their properties	No	Mel Tanner
49603	No	Yes	I'm happy with the size of the bins we already have, I'm sure if people want to pick and change it will cost them.	No	Kathleen Himiona
49602	No	Yes	Would like to see more detail on building material recycling yards. Too much building material and waste on site going to landfill. Please open up an eco store for building material, make it free for drop off to encourage recycling. Like the idea of more choices for kerb side delivery. Bigger green bins, smaller red bins. More infrastructure required for recycling milk cartons and soft plastics.	No	Jill Fulcher
50078	Yes, in part - see comments below	No	Kerb collection 9.1 assistance: should not be limited to red bins only. Disabled people's should not be prevented from participating in recycling and comparing green waste via the council collection. Part 3, 20. Event management: events should be required to separate waste into the three main streams, red, yellow green. Even if it is at additional cost to the event. Events often collect many cans and bottles that could be recycled and green waste that can be compared. These events are also an opportunity to educate the public on proper waste stream separation. For more profitable waste recovery the council should consider an additional blue waste stream for paper and cardboard waste that is common overseas.	No	Katie Simpson
50060	Yes, in part - see comments below	No	I support more bin options, in particular being able to have a smaller red bin. I have no opinion on other aspects.	No	Graham Wagener

Submission Table – Draft Waste Management and Minimisation Bylaw, 2023

ID	Support proposed changes	Shopping trolleys need addressing?	Comments	I would like to speak	Name Organisation Role
49844	Yes, in part - see comments below	No	<p>I am writing to the council and submitting plastic waste recycling.</p> <p>I have been involved in the plastic industry for 30 years. I understand the complexities, there are many. The recycling system is confusing. Moving forward, many people do not know only numbers 1, 2 and 3 should go in the recycle bin, and the rest can go in the red bin. Bring a bit more radical, craft and newsprint paper products should go into the green waste bin. That's where they came from and will happily return to.</p> <p>Any container that is discarded after its original contents have been used is a single-use container. Examples of this are PET drinking bottles, and shampoo and conditioner containers. Some of these containers are realistically necessary. One container that is entirely unnecessary in Christchurch is the H2O container. In 2009 Bundaberg (Australia) banned the sale of bottled water. Paris has sparkling water fountains in the city. Christchurch can have alluvial filtered water from the Southern Alps freely available about the city. People would be repulsed to find me filling up my water bottle at the service station. They didn't realise it was the town supply, the water they drink at home, from the Alps.</p> <p>I propose Christchurch take the radical move like cities and pass a bylaw, to ban the sale of single-use plastic for containing water. This would not be easy; it has been achieved internationally to reduce the horrendous environmental damage caused by these bottles. Keep in perspective that people didn't think banning single-use supermarket bags was possible. This would demonstrate Christchurch is not rhetoric environmental claims but takes a (radical) stand in improving the environment.</p>	No	Roland Matthews
49627	Yes, in part - see comments below	No	Weekly red bin collection or a larger red bin and payment put into rates for those who choose this would be really good	No	Amanda Davidson-Black
49618	Yes, in part - see comments below	No	The Organic (green lid) bin should be a lot bigger than the small size we currently have. This is the Garden City and we should live up to it.	No	Patricia Meagher
49616	Yes, in part - see comments below	No	Give everyone the option of a large green bin for free. people just put the extra green waste in their red bin	No	Richard Rowe
50080	Yes	No		No	Andrew DC
49691	Yes	No	<p>Not sure how the shopping trolley issue would be addressed! I think it is part of a wider social issue.</p> <p>I love the idea of being able to have a smaller yellow bin without it coming at a cost. I live in a fairly high density area. I only put the yellow bin out every few weeks because I never fill it, but on the narrow foot path on Parlane Street Addington, and with so many bins, they take up a lot of the footpath. I'm aware of potential difficulties this can pose for blind-low vision people, those with mobility issues, people with buggies. This problem is exacerbated by abandoned shopping trollies (though not usually on my street) and scooters parked in the middle of footpaths</p>	No	Ruth Wilkins
49637	Yes	No	<p>Shopping trolleys are always everywhere.</p> <p>It's frustrating having to report them, however the root cause is people not having any other options of getting their groceries or large items home. So while it's annoying, I don't want any action made against those who dump the trolleys as the majority do so because they have little or no other option.</p> <p>I'm not sure what this has to do with the water management changes though, I don't see anything in the new document.</p>	No	George Laxton
49610	Yes	No	Bigger red and green bins by choice would be fantastic	No	Amanda OBrien
49608	Yes	No	I feel that the property size should be taken into account eg larger properties should get larger bins .. not fair a 100sqm house/section get the same as a 250sqm flat ... I also think if you increase the red and green bin sizes you will find less unwanted items in the yellow bins	No	Tasha Preece
49593	Yes	No	Ideally small red bin and large green and yellow bin for each house plus free compost house buckets.	No	Jo Musson
49591	Yes	No	Can we please have bigger green bins for Kerb side collection. The small green bin is standard and a bigger one would be great. One that is not requiring money, a bigger green bin should be standard.	No	Amy Burrough
49613	No	No	Hi green bins need to bigger the same size as yellow bin green bin far to small red and yellow bin are good	No	Debbie Free
49609	No	No	You need to be more specific, every resident must be allowed to pick which bin sizes they want. Its absurd that someone cant do that today based on their own families needs.	No	Cooper Andrew

Submission Table – Draft Waste Management and Minimisation Bylaw, 2023

ID	Support proposed changes	Shopping trolleys need addressing?	Comments	I would like to speak	Name Organisation Role
50418	Yes, in part - see comments below		I would like to continue putting fliers from Christchurch M.P.s and the Labour Party into letter boxes without incurring a fine from the C.C.C. I agree with the concern of cutting back on waste. I am careful not to put leaflets/ fliers into letter boxes marked 'Addressed Mail Only,' or 'Stamped Addressed Mail.' All other letter boxes get one. This leaves the choice with the individual household. Curtailing this activity would be a backward step for our democracy.	No	Roger C Pike
49848	Yes		<p>I am strongly in support of updating the legislation for clarity and consistency etc.</p> <p>I am strongly in support of e. "allow residents to opt out of, and not pay for, the Council's kerbside collection services in certain circumstances e.g., where the Council's contractor cannot easily access an area", and f. "Provide more flexible rules for Council kerbside collection service, e.g., to allow for a wider range of bin options."</p> <p>For anything like waste management where we would prefer for less waste to be produced, moving to a more user-pays system makes sense. Would only caveat that it is important that residential renters are guaranteed access to bins.</p> <p>I am strongly in support of g. "Allow new requirements for waste management plans in some circumstances so that waste is managed more effectively", especially for Multi-unit residential developments. It is very important that we dramatically increase housing density in the city and make changes to support this.</p> <p>I support j. "Revise provisions for waste handling and disposal facilities to support the diversion of materials from landfill and to ensure that all waste materials are disposed of appropriately.", with the caveat that while diverting waste from landfill is a positive in and of itself, this should not be done in any way that is likely to significantly increase greenhouse emissions. Landfill is a more manageable problem than climate change.</p>	No	Richard Abey-Nesbit
49804	Yes		Provide larger green bins for larger lots. It is absolutely absurd to provide small bins to larger properties without expecting green rubbish in the red bins. Especially when property owners are expected to maintain berms in the road reserve. Encourage maintenance of properties and maximise composting outputs.	No	Nikki Smetham

Submission Table – Draft Waste Management and Minimisation Bylaw, 2023

Not applicable

ID	Support proposed changes	Shopping trolleys need addressing?	Comments	I would like to speak	Name Organisation Role
50038	Yes	Yes	<p>Are you tired of spending hours on writing content? Do you need creative ideas to boost your business?</p> <p>There is a new intelligent writing tool that revolutionizes the way you write. Using it, you can write faster and more efficiently than ever before. Don't believe us?</p> <p>Say goodbye to writer's block and hello to effortless writing - try it for yourself by clicking this link: [REDACTED]</p> <p>Lovely greets, Anja</p>	Not applicable	Anja White

Submission #49925

20 February 2023

Christchurch City Council

By online submission to 'Have your say' page

Tēnā koe,

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Waipapa Papanui-Innes-Central Community Board Submission on Draft Waste Management and Minimisation Bylaw 2023

1. Introduction

The Waipapa Papanui-Innes-Central Community Board ('the Board') thanks the Council for the opportunity to submit on this consultation. It does so in accordance with its role to represent, and act as an advocate for, the interests of its community in the Papanui-Innes-Central area.

2. Submission

The Board is generally supportive of the reasons for review at this time recognising the value of the proposal towards achieving the Council's Waste Management and Minimisation Plan 2020, including the goal to move to zero waste, and align with the Council's Climate Resilience Strategy.

Having given particular attention to the key proposed changes from the current bylaws, comments are made below on those main changes considered most pertinent by the Board:

Allow the Chief Executive to make changes to terms and conditions

It is recognised that regulatory tools should be adaptable and without undue bureaucracy to enable a fair, relevant, and effective response to circumstances.

To the extent that this is consistent with this proposed change and ensuring that consultation processes are retained, including briefing community boards where relevant to their role in advocating for their communities, this aspect to the draft bylaw is supported by the Board.

Allow residents to opt out of, and not pay for, Council's kerbside collection services in certain circumstances e.g. where Council's contractor cannot easily access an area

With increasing intensification the Board supports the need for practical alternatives to large kerbside clusters of individual units' bins as these present unpleasant and bulky obstructions for pedestrians to avoid that also significantly reduce neighbourhood amenity however temporarily.

Submission #49925

Provide more flexible rules for Council kerbside collection service e.g. to allow for a wider range of bin options

Flexibility is supported where it will assist communities to develop the most effective options for achieving their aspirations for convenience and amenity. Dealing with waste in ways that can be adapted to the circumstances is supported as common sense. We understand there may be cost implications for residents choosing different sized bins, but ask that these be kept to a minimum in order to encourage the increased use of recycling and organics bins over rubbish bins.

Allow new requirements for waste management plans in some circumstances so that waste is managed more effectively for:

- ***Multi-unit residential developments***
- ***Demolition and construction activities***
- ***Large scale events***

Intensive developments, construction activities and large scale events can have significant impacts on neighbourhoods. It is important that expectations for clear and enforceable waste management are fulfilled as a matter of respect due to those who have lived in an area prior to the arrival of the development, activity or event.

Allow new rules to address the problems caused by unaddressed mail and advertising material and to deal with nuisance from litter, including litter around donation boxes for clothing and household goods

The Board is concerned that the rules not unfairly affect or discourage the circulation of community newsletters and publications that foster community activation and participation and counter social isolation.

The Board supports the proactive and responsive approach to dealing with litter around donation boxes for clothing and household goods, provided the Council continues to be proactive in the area of providing education and facilitation around waste minimisation and honour well-meaning intent for recycling and making donations that genuinely assist the community.

Allow the Council to set standards for the collection points for recycling and diverted materials, given the likely introduction of container return schemes

The Board is supportive of carefully introduced, well-publicised and well-supported standards.

Revise provisions for waste handling and disposal facilities to support the diversion of materials from landfill and to ensure that all waste materials are disposed of appropriately

The Board endorses and supports the importance of having provisions that are fit-for-purpose in respect to properly diverting materials from landfill where appropriate.

Submission #49925

Amend the licensing requirements for waste operators, including for the collection of data, to enable more effective monitoring of the effectiveness of the Council's Waste Management and Minimisation Plan

The Board recognises the importance of data and monitoring in relation to the Council's Waste Management and Minimisation Plan, and supports considered measures in this respect.

3. Summary / Other Feedback

In respect of the specific questions in the submission form, the feedback on behalf of the Board is reflected in this table:

Question	Feedback
Do you support the proposed changes to the Bylaw?	Yes, in part – see comments above and below.
Are shopping trolleys on public land an issue that needs to be addressed?	Yes. This is an issue that has been brought to us by local residents, and continues to be an issue in some areas despite our attempts to work with commercial businesses.
Comments - Please be as specific as possible to help us understand your views.	Refer above comments underneath relevant key proposed changes. The Board considers that further clarity is needed around what advertising material would trigger adverse provisions. This is in light of community concern Board members have heard in respect of materials that residents associations and other community groups circulate to inform neighbourhoods of their activities and similar initiatives.

Nāku noa, nā



Emma Norrish
Chairperson
Waipapa Papanui-Innes Community Board


Submission #50053

SUBMISSION TO: Christchurch City Council

ON: Draft Waste Management and Minimisation Bylaw 2023

BY: Waitai Coastal-Burwood-Linwood Community Board

CONTACT: Paul McMahon
Chairperson, Submissions Committee
C/- PO Box 73023
CHRISTCHURCH 8154



1. INTRODUCTION

The Waitai Coastal-Burwood-Linwood Community Board appreciates the opportunity to make a submission to the Christchurch City Council on the Draft Waste Management and Minimisation Bylaw 2023.

The Board wishes to be heard in support of this submission.

2. SUBMISSION

Do you support the proposed changes to the Bylaw?

- Yes in Part – see comments below

Are Shopping trolleys on public land an issue that needs to be addressed?

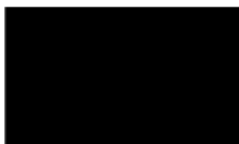
- No

Comments:

1. The Board has concerns regarding the impact of clauses 21 and 22, the proportionality of potential enforcement measures, and the delegations to the CEO to change regulations under the by-law.
2. Clause 21 (1) reads:
No person may deposit, cause, permit or authorise the deposit of any unaddressed mail or advertising material in any letterbox which is clearly marked “no circulars”, “no junk mail”, “addressed mail only” or with words of similar effect, (a) Around or near any such letterbox or associated vehicle access-way; (b) On any vehicle parked in a public place; or (c) in a letterbox that is already full of mail and/or advertising materials.
3. The definition of advertising material is:
Advertising material means any message which: (a) has printed content controlled directly or indirectly by the advertiser; and (b) is expressed in any language and communicated in any medium with the intent to influence the choice, opinion or behaviour of a person.
Explanatory Note: Advertising material includes material such as circulars, leaflets, flyers, brochures, business cards, samples and clothing donation bags.

Submission #50053

4. When coupled with clause 26, an individual could be fined \$20,000 for breaching this, which seems excessive. It could have a chilling effect on civic discourse, for instance what happens if everyone has one of those signs? They consultation documents there's no Bill of Rights Act (BORA) impacts, but section 14 of BORA says: *"Everyone has the right to freedom of expression, including the freedom to seek, receive, and impart information and opinions of any kind in any form."*
5. The Board questions how postal communications from the *Council*, such as flyers, would be covered should this proposal be adopted. E.g. Start Work Notices etc.
6. Clause 22 (1),
No person may: (a)Allow any accumulation of waste on any premises they own, occupy or manage to become offensive, a nuisance or likely to be injurious to health; or (b)Use an approved receptacle in a manner that creates a nuisance, is offensive or is likely to be injurious to health.
7. When coupled with clause 26, this could see impoverished and unwell people further marginalised. It also creates room for malicious and vexatious complaints from neighbours. The Board are concerned about people who are without financial or psychosocial resources being mistreated.
8. Taking a trailer-load of rubbish to the dump is not within everyone's capability or resources, if the Council going to have the "stick" then we need to provide some kind of hard rubbish collection/service for people who are in need (at least).
9. The Board asks how will the Council address the significant equity issues surrounding how to deal with waste?
10. The Board would like the principle of proportionality with regard to any enforcement measures to be explicitly stated in the by-law.
11. The Board suggests under the draft terms and conditions for kerbside collections and community collections points, that the *"CEO may with agreement of the full Council, or relevant committee"* make changes.



Paul McMahon
Chairperson, Submissions Committee
WAITAI COASTAL-BURWOOD-LINWOOD COMMUNITY BOARD

20 February 2023

Trim: 23/263131

Submission #50124

**SUBMISSION ON PUBLICLY NOTIFIED DRAFT WASTE MANAGEMENT AND MINIMISATION
BYLAW 2023**


Section 155 of the Local Government Act 2002

To Christchurch City Council

Name of submitter: **Winstone Wall Boards Limited (WWB)**

- 1 This is a submission on the Draft Waste Management and Minimisation Bylaw 2023 (WMMB)
- 2 WWB could not gain an advantage in trade competition through this submission.
- 3 The specific provisions of WMMB that WWB's submission relates to and the reasons for WWB's submission are set out in **Appendix A and B** below.
- 4 WWB's submission:
 - a. WWB seeks to an exemption from the definitions '**Construction and demolition waste**' and '**Waste Operation**' to ensure that their manufacturing operations are not unduly captured by the above definitions', resulting in the requirement for the operation to provide a WMP or Waste Operation Licence.
 - b. WWB seeks clarification that there are no operational requirements for activities generating waste that falls within the definition for '**Commercial and industrial waste**'.
 - c. WWB seeks an exemption to the requirements for a '**Construction and Demolition Waste Management Plan**' and '**Waste Operations Licence**' where Commercial and industrial activities recycle waste materials on-site that exceed 30 tonnes, particularly if they are fed back into the manufacturing cycle.
- 5 The general and specific reasons for WWB's relief sought in **Appendix A**.
- 6 WWB seeks the following decision from the local authority:
 - a. Grant the relief as set out in **Appendix B**;
 - b. Grant any other similar and/or consequential relief that would deal with WWB's concerns set out in this submission.
- 7 WWB wishes to be heard in support of the submission.
- 8 If others make a similar submission, WWB will consider presenting a joint case with them at a hearing.

Signed for and on behalf of Winstone Wallboards Limited by its Resource Management Consultants and authorised agents Resource Management Group Ltd


Jacqui Hewson
Senior Consultant
24 February 2023

Submission #50124

Appendix A

INTRODUCTION

- 1 WWB welcomes the opportunity to submit on the Draft Waste Management and Minimisation Bylaw 2023 (WMMB)
- 2 The submission is broadly organised as follows:
 - [Summary of WWB's submission](#)
 - [Statement of Interest and Background](#)
 - [Specific submission in relation to the regulatory context](#) [Summary of relief sought](#)
 - [Conclusion](#)
 - [Detailed relief sought \(contained in Appendix B\)](#)

SUMMARY

Submission in Opposition to Draft Waste Management and Minimisation Bylaw

- 3 WWB generally supports the Council's initiatives to maximise the recovery of recyclable resources and ensure that waste is collected in a safe and efficient manner.
- 4 However, WWB's key concern is ensuring that the definitions, particularly in relation to 'commercial and industrial waste', 'construction and demolition waste' and 'waste operation' do not have any unintentional consequence in terms of the requirement for Waste Management Plans or Licencing, as currently drafted.
- 5 WWB submits that further refinement needed to the above definitions and greater clarity provided to the requirement and applicability of Waste Management Plans and Licencing.
- 6 Detail in support of this are provided below, along with contextual background.

STATEMENT OF INTEREST AND BACKGROUND

- 7 Winstone Wallboards Limited (WWB) is the largest manufacturer and distributor of gypsum plasterboard, drywall systems, associated products and services in the country. WWB is New Zealand's only manufacturer and largest marketer of gypsum plasterboard, drywall systems, associated GIB products and services. WWB has multiple locations throughout New Zealand, including its operational manufacturing and distribution site at 19 Opawa Road, Hillsborough, Christchurch.
- 8 The company has a strong environmental ethos and is committed to waste minimisation of its resources, in particular GIB Plasterboard. WWB's website provides a range of tools to assist users of their product with minimising plasterboard waste.¹ As part of its onsite operation, their Christchurch facility has a 'Standard Operating Procedure' (SOP) in place to ensure that as much recycling of production waste is carried out and is dedicated to ensuring that all production waste is correctly segregated and recycled where possible.
- 9 For example, any clean waste plasterboard, such as offcuts or defective sheets are recycled by segregating the gypsum inside the plasterboard, which is then reused for agricultural gypsum.
- 10 WWB has aspirations to provide for a greater level of recycling of all waste produced on site, both carried out on-site, that is then fed back into the manufacturing cycle and

¹ <https://www.gib.co.nz/about-winstone-wallboards/aboutsustainability/gib-plasterboard-waste-minimisation-resources/>

Submission #50124 to third parties for reuse, such as waste gypsum being used as agricultural fertilizer or for composting use, in addition to recycling both paper and plastics.

GENERAL SUBMISSION

Key aims of the submission

- 11 Given the housing crisis in New Zealand, the continued supply of building materials is of utmost relevance and importance to WWB as New Zealand's only manufacturer and largest marketer of gypsum plasterboard, drywall systems, associated GIB products and services.
- 12 The principal aim of this submission is therefore to ensure the continued efficient operation of WWB Christchurch sites and the subsequent continued supply of building materials to support residential intensification by establishing the most appropriate provisions to achieve that goal and assist the Council in implementing relevant direction from higher order statutory instruments – particularly the National Policy Statement on Urban Development 2020 (NPS-UD).
- 13 WWB also seeks amendments to the notified draft WMMB to better implement the requirements of section 155 (2) of the Local Government Act 2002.² These are detailed in [Appendix B](#).

SPECIFIC SUBMISSION IN RELATION TO THE REGULATORY CONTEXT

Definitions included in the Draft Waste Management and Minimisation Bylaw

- 12 The Council states that review of the existing two Bylaws³ is to ensure they are consistent with the recent changes to regulations under the Waste Minimisation Act 2008 (WMA).
- 13 The WMA includes a definition of 'waste' as:
*"(a) means anything disposed of or discarded; and
(b) includes a type of waste that is defined by its composition or source (for example, organic waste, electronic waste, or construction and demolition waste); and
(c) to avoid doubt, includes any component or element of diverted material, if the component or element is disposed of or discarded"*⁴
- 14 The WMMB states the definition of 'waste' has the same meaning provided in the Waste Minimisation Act 2008.
- 15 However, the WMMB provides further definition of two types of waste, which we discuss in turn below:
 - a. **'Construction and demolition waste'**
 - b. **'Commercial and industrial waste'**
 - c. **'Waste Operation'**

A: **'Construction and demolition waste'**
- 16 **'Construction and demolition waste'** as *"waste generated from any building work (including renovation and repair); and includes, but is not limited to concrete, plasterboard, insulation, nails, wood, brick, paper, cardboard, metals, roofing materials, wool/textiles, plastic or glass, as well as any waste originating from site preparation, such as dredging materials, tree stumps, asphalt and rubble."*⁵

² Procedure for making bylaws, Section 155, clause (2) (a) is the most appropriate form of bylaw

³ The Waste Management Bylaw 2009 and The Cleanfill and Waste Handling Operations Bylaw 2015

⁴ Section 5: Interpretation, Waste Minimisation Act 2008

⁵ Section 3: Interpretation, Page 2, Draft Christchurch City Council Waste Management and Minimisation Bylaw 2023

Submission #50124

- 17 Given that the above definition includes 'plasterboard', as currently defined, it would therefore encompass waste generated at WWB's Christchurch site as 'construction and demolition waste'.
- 18 To note, the current Bylaws⁶ do not further differentiate 'construction and demolition waste' from the general definition of 'waste'.
- 19 WWB considers that the definition of 'construction and demolition waste' should exclude waste that is generated by commercial manufactures of the products listed, such as plasterboard. It is possible that this was the intention of draft WMMB but unfortunately this is not borne out by the definition. Providing for an exemption for commercial manufacturers, such as WWB, would better align with the Waste Minimisation Act 2008 definitions and intent of focusing on 'construction and demolition activities' rather than the actual waste product itself.

B: 'Commercial and industrial waste'

- a. The WMA does not provide a definition of 'Commercial and industrial waste', which is defined by the WMMB as "*means all solid waste that results from a commercial or industrial enterprise and includes waste generated by the carrying on of any business, factory, manufacture, process, trade, market, or other activity or operation of a similar nature.*"
- b. Waste generated from WWB Christchurch site would fall under this definition, as "*waste generated by the carrying out of any business, factory, manufacture.....*"
- c. However, it is not clear what the intention of this definition is utilised for, other than being referenced in the explanatory note, which excludes 'commercial and industrial waste from the definition of 'Hazardous waste'.
- d. WWB seeks confirmation that there are no other uses of this definition other than the exclusion from 'Hazardous waste'.

C: 'Waste Operation'

- 20 The WMMB provides a definition of for a Waste operation meaning:

" (a) any facility (land or buildings) to which waste is disposed of or where discarded materials are delivered for consolidation, sorting, storage, processing, treatment or disposal; including (b) transfer stations, hazardous waste treatment facilities, materials recovery facilities, composting facilities, recycling and re-use facilities, resource recovery parks and centres, and landfills (including managed or controlled landfills as defined above).

- 21 As set out in paragraph 10 above, WWB seeks the ability to carry out increased recycling opportunities of production waste to reintegrate materials back into the production cycle.
- 22 WWB is therefore seeking assurance that the onsite 'processing, recycling and re-using' of its own 'commercial and industrial waste' is not captured in this definition, as this may have an unintentional consequence of identifying WWB as a 'Waste Operation' and subsequent requirement to obtain a Waste Operation Licence, which is further discussed in paragraphs 30-33 below.

Introduction of a Construction and Demolition Waste Management Plan

- 23 WWB appreciates and supports the intent of introducing Construction and Demolition Waste Management Plans (**WMMPs**) for projects involving demolition, site works and/ or construction.

⁶ The Waste Management Bylaw 2009 and The Cleanfill and Waste Handling Operations Bylaw 2015

Submission #50124

- 24 However, what is not clear is whether WWB existing operation, that involves the generation of 'construction and demolition waste' is encapsulated by the phrase "projects involving demolition, site works and/or construction".
- 25 WWB considers that clarification is needed on this matter and an exemption is included that excludes manufacturing facilities that produce material defined as 'construction and demolition waste' from preparing WMPs.
- 26 If, under the current definition, WWB were required to prepare a WMP, this may lead to additional operational costs, both in the preparation of the WMP but also may result in additional monitoring requirements from the Council, which would divert Council's resources from activities that produce greater levels of construction and demolition waste and therefore would not best provide for the intended outcomes of the WMMB.

Introduction of licence requirements for waste operations

- 27 The requirement for a licence for waste operations states:
"(1) No person may handle, process, store or dispose of more than 30 tonnes of waste in a 12 month period unless:
 - (a) The Council has granted a waste operations licence to that person for that waste operation; and*
 - (b) That person (the licensee) complies with all terms and conditions of the licence."* WWB considers that 12(1) should exclude 'commercial and industrial' operators where on-site recycling and processing of manufacturing waste occurs, that is then re-fed back into new plasterboard production.
- 28 As currently drafted, whether or not WWB may be captured in the requirement for licencing is determined by (1)(a); namely whether or not they are recycling more than 30 tonne of production waste that is fed back into their manufacturing cycle. As a result, as currently drafted, the licencing requirement may become a deterrent for commercial and industrial operations carrying out onsite recycling where it is fed back into their manufacturing cycle.
- 29 WWB considers that the licencing requirements need to be refined to ensure that it encourages commercial and industrial activities to carry out onsite recycling. Therefore, WWB considers an exemption should be added for Commercial and Industrial activities that recycle more than 30 tonnes of waste.

SUMMARY OF RELIEF SOUGHT

- 30 In summary, with respect to the definitions of:
 - **'Construction and demolition waste'**
 - **'Waste Operation'**
- 31 WWB seeks to an exemption from the definitions to ensure that their operation is not captured by the above definitions', resulting in the requirement for the operation to provide a WMP or obtain a Waste Operation Licence.
- 32 With respect to the definition for **'Commercial and industrial waste'**, WWB seeks clarification that there are no operational requirements for activities generating waste that falls within this definition. To clarify, WWB seeks that an explanatory note should be included to the definition. With respect to the requirement for a **'Construction and Demolition Waste Management Plan'** and **'Waste Operations Licence'**, WWB seeks an exemption to the requirements for these where Commercial and industrial activities recycle waste materials on-site that exceed 30 tonnes, particularly if they are fed back into the manufacturing cycle.

⁷ Part 2: Waste Operations, 12: Licence required for waste operations. Page 10, Draft Christchurch City Council Waste Management and Minimisation Bylaw 2023

Submission #50124
CONCLUSION

- 33 For reasons set out in this submission, WWB considers amendments to WMMB are required to ensure better align with the Waste Minimisation Act 2008 and provide for the overall intent of the draft Bylaw to encourage recycling.
- 34 WWB currently recycles a high volume of waste product and seeks to increase the level of recycling both on and off site in the future.
- 35 As currently drafted, the WMMB may unduly capture WWB SOP recycling practices and may also discourage other activities from carrying out onsite recycling, particularly where it feeds back into the manufacturing cycle as an unintended consequence of the current definitions and requirements qualifiers.
- 36 WWB preference is to amend the draft WMMB to ensure the intended outcomes of the Bylaw are clarified through the relief of changes sought in **Appendix B**.

Submission #50124

APPENDIX B

Draft Waste Management and Minimisation Bylaw 2023 – Detailed Relief

Submitter Name: **Winstone Wallboards Ltd**

Part	Specific matter	Position	Reason for submission	Decisions requested / relief sought
3. Interpretation	Definition of 'Construction and demolition waste'	Oppose	WWB considers that that unduly captures their operational waste given it specifically includes 'plasterboard'	<p>WWB seeks for an exemption to be included to the definition to clarify that waste generated from the manufacturing of 'plasterboard' and all other material listed as construction and demolition waste is not included in the definition.</p> <p><i>"Construction and demolition waste means waste generated from any building work¹ (including renovation and repair); and includes, but is not limited to concrete, plasterboard, insulation, nails, wood, brick, paper, cardboard, metals, roofing materials, wool/textiles, plastic or glass, as well as any waste originating from site preparation, such as dredging materials, tree stumps, asphalt and rubble.</i></p> <p>1. Exemption: Does not including manufacturing waste of the materials listed</p>
3. Interpretation	Definition of 'Commercial and industrial waste'	Oppose	WWB considers	<p>WWB seeks clarification on the intended use of this definition and that it does not have any operational requirements associated with the definition and include an explanatory note stating:</p> <p><i>Explanatory note: There are no operational or licencing requirements in relation to this definition.</i></p>
3. Interpretation	Definition of Waste Operation	Oppose	WWB consider that the definition may unduly capture their internal recycling of production waste.	<p>WWB is seeking an exemption that onsite 'processing, recycling and re-using' of its own 'commercial and industrial waste' where it is fed back not the manufacturing cycle is not captured in this definition.</p> <p><i>"Waste operation means:</i></p> <p><i>(a) any facility (land or buildings) to which waste¹ is disposed of or where discarded materials are delivered for consolidation, sorting, storage, processing, treatment or disposal; including</i></p>

Part	Specific matter	Position	Reason for submission	Decisions requested / relief sought
				<p><i>(b) transfer stations, hazardous waste treatment facilities, materials recovery facilities, composting facilities, recycling and re-use facilities, resource recovery parks and centres, and landfills (including managed or controlled landfills as defined above).</i></p> <p><u>1. Exemption: Does not including manufacturing waste that is recycled onsite and fed back into the manufacturing</u></p>
Part 2: Waste Operations	12: Licence required for waste operations	Oppose	WWB's considers that the current wording may unduly act as a deterrent for on-site recycling.	<p>WWB seeks an exemption to be included for the licence required for waste operators:</p> <p><i>(1) No person may handle, process, store or dispose of more than 30 tonnes of waste in a 12 month period unless: (a)The Council has granted a waste operations licence to that person for that waste operation; and (b)That person (the licensee) complies with all terms and conditions of the licence.¹</i></p> <p><u>1. Exemption: Does not apply to Commercial and Industrial activities that recycle more than 30 tonnes of waste on-site, that is fed back into the manufacturing cycle.</u></p>
Part 3: Other Waste Matters	Section 19 (1): Construction and Demolition Waste Management Plan	Oppose	WWB's considers that the current wording of the WMMP may require their operation to prepare a WMP.	<p>WWB seeks an exemption to be included to clarify that manufacturing facilities of materials listed in the definition of 'construction and demolition waste' would not be required to prepare a WMP under the Section 19 (1).</p> <p><i>"(1) The Council may require a WMP to be prepared for its approval for projects involving demolition, site works and/or construction.¹</i></p> <p><u>1. Exemption: Does not including manufacturing operations that produce waste materials listed in the definition of 'Construction and Demolition Waste'</u></p>

Submission #50040

Submission to the Draft Waste Management and Minimisation Bylaw 2023

In principle I agree with the intentions of the Draft Bylaw. However there are some areas that I wish to comment on for more comprehensive inclusion in the Bylaw.

A Illegal Dumping

1. I do not consider that it goes far enough in addressing the illegal dumping of materials in public places. I acknowledge that the Draft Bylaw includes provision for the dumping of goods outside charity shops and bins. However this only deals with just one practice.
2. There has been an increasing prevalence of the dumping of waste within the city and not utilising the measures that Council has put in place through previous bylaws and minimisation plans. This can be seen through the dumping of rubbish on street kerbsides, within parks, shopping centres and other public places as well as fly tipping in less populated areas.
3. Overall, the effects of dumped rubbish in a community can be serious and long-lasting, affecting the health, environment, and social and economic well-being of community members as set out in the following table;

Effect	Outcomes
Health	Increased if the waste includes hazardous materials or medical waste
Environmental damage	Contamination of soil, water, and air. This can harm local ecosystems and wildlife, reducing biodiversity and threatening the long-term health of the environment.
Increased costs for waste management	Diverts resources from other important community services and infrastructure
Fire hazards	Increased when the waste includes flammable materials such as oils, chemicals, or combustible waste. These materials can ignite and spread quickly, posing a risk to nearby homes and businesses.
Vermin	Attracts pests such as rodents and insects, which can spread disease and cause damage to property. This can create a nuisance for community members and make it harder to control pest populations.
Social and cultural impacts	Creates a sense of neglect and disrepair in the community. This can contribute to social dislocation, reduced community cohesion, and increased crime rates.
Decreased property values	Makes it harder for homeowners to sell their properties or secure loans. This can have a negative impact on the local economy and discourage investment in the community.
Quality of life and sense of safety	Discourages community members from spending time outdoors and enjoying local parks and recreational areas.
Anti-social behaviour	Attracts nuisance behaviour such as graffiti, loitering, drug use, and other forms of anti-social behaviour. This can create a sense of fear and discomfort among community members, as well as contribute to a general sense of disconnection from the community and its surroundings.

4. The Bylaw has the potential to help to address illegal dumping of rubbish and promote responsible waste management practices. Through including in the Bylaw, a combination of prohibition, penalties, enforcement, and education, Council can work to build a more sustainable and resilient community, while protecting the environment and public health.

B Waste Minimisation Education

5. There is little provision in the Bylaw for waste minimisation education, with a focus on providing information and support to households and businesses to help them reduce their waste. Educating the community about waste reduction and minimisation helps to build awareness and promote sustainable behaviours, leading to greater waste reduction outcomes.

C Community-Led Initiatives

6. The Bylaw has the potential to support and encourage community-led waste reduction initiatives, by providing provision for funding and other support to community groups and partnering with them to develop and implement waste reduction and minimisation initiatives. By working together with the community, Council could achieve greater waste reduction outcomes and build more sustainable and resilient communities.
7. This could include provision for a voucher or permit system at Eco Drop transfer and recycling stations or similar for community organisations that undertake community clean-ups or recycling initiatives.

Submission #50040

D Unaddressed mail and advertising

8. I fully support the inclusion of this within the Bylaw (section 21). I also support the inclusion of an exclusion clause to 21.1.a similar to;
9. *Clause 21.1(a) does not apply to:*
 - (a) *material or public notices from any government department or agency, crown entity, local authority, or material from a network utility relating to the maintenance, repair, servicing or administration of that network utility;*
 - (b) *communications from local community organisations, charities or charitable institutions including community newsletters unless the letterbox is clearly marked "no community newspapers" or with words of similar effect.*
10. While there is an increasing use of social media channels to provide information to our communities. However with this is also an increasing disenfranchisement of sectors of the population who do not have access to, or choose not to use, social media. There are times when 'letterbox drop methodology' is essential in keeping residents informed and the inclusion of clauses within the spirit of (a) and (b) allows this to happen.
11. Section (a) provides residents to be appraised of essential information that can affect their lives. Section (b) allows for the provision of community-based information. Not only does this have the potential to increase involvement within community activities, but it also provides for effective community-led response systems during times of crisis and emergency.

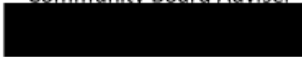
E Shopping Trolleys

12. I fully agree that abandoned shopping trolleys are an issue and retailers need to be strongly encouraged to take greater responsibility in recovering these. I would support any inclusion of this within the bylaw if appropriate.
13. I would like to suggest some measures that could be investigated that are used internationally;
 - a. **Wheel-locking systems:** Wheel-locking systems can activate if they are taken outside the supermarket premises. This system prevents people from taking trolleys beyond the supermarket car park and deters theft.
 - b. **Coin-operated trolleys:** Customers have to insert a coin or token to release the trolley. When they return the trolley, they get their coin or token back. This system discourages people from stealing trolleys because they need to pay a fee to use them. It would also allow for enterprising individuals to collect trolleys and return them to a supermarket.
 - c. **Electronic tracking:** Trolleys could have electronic tracking systems that allow supermarkets to locate them if they are taken off the premises. The tracking systems can also be used to alert the store if a trolley is taken beyond a certain distance from the store.
 - d. **Security personnel:** Supermarkets could employ security personnel to monitor the car park and prevent trolley theft. The security personnel can alert customers if they see someone taking a trolley off the premises, which can discourage theft.
 - e. **Supermarkets may use CCTV cameras** to monitor the car park and identify any trolley theft. The cameras can also act as a deterrent because people are less likely to steal trolleys if they know they are being watched, especially if signage indicates this.

Thank you for the opportunity to submit on this Draft Policy.

Marie Byrne

Submission #50052

SUBMISSION TO: Christchurch City Council
ON: Draft Waste Management and Minimisation Bylaw 2023
BY: Waipuna Halswell-Hornby-Riccarton Community Board
CONTACT: Faye Collins
Community Board Adviser


1. INTRODUCTION

- 1.1. The Waipuna Halswell-Hornby-Riccarton Community Board (“the Board”) appreciates the opportunity to make a submission on the Council’s Draft Waste Management and Minimisation Bylaw 2023 (“the Bylaw”).
- 1.2. The Board wishes to be heard in support of its submission.

2. SUBMISSION

- 2.1. The Board supports the approach of replacing the two current bylaws with one bylaw to regulate all waste collection services and operations, including landfills.
- 2.2. The Board notes the new rules that address the problems caused by unaddressed mail and advertising material, and to deal with nuisance from litter, including litter around donation boxes for clothing and household goods.
While the Board is generally supportive of the rule it considers that there needs to be more clarity about what is regarded to be advertising material for the purpose of clause 21. The definition currently proposed in clause 3 is :
“Advertising material means any message which:
(a) has printed content controlled directly or indirectly by the advertiser; and
(b) is expressed in any language and communicated in any medium with the intent to influence the choice, opinion or behaviour of a person”
- 2.3. The Board considers that this definition is very broad and could inadvertently capture election campaign material which is important to be provided to all voters, particularly with relatively low voter participation.
- 2.4. The Board therefore suggests a change to the definition of **“Advertising material** “to make it clear that it excludes any authorised election campaign material in the period within eight weeks of a national or local election.

Submission #50052

3. CONCLUSION

- 3.1. The Board requests that the Council takes into consideration the above submission on the Draft Waste Management and Minimisation Bylaw 2023.



Helen Broughton

Chairperson Waipuna Halswell-Hornby-Riccarton Community Board

Dated 24 February 2023.

Submission #49704

Submission- Draft Waste Management and Minimisation Bylaw 2023

Anthea Madill

Submitting on behalf of Remix Plastic and Sustained Fun Limited


Yes, we agree that the updating of the Bylaw is important to be in line with the Waste Minimisation Act, Council's Waste Management and Minimisation Plan 2020 and Council's Climate Resilience Strategy.

We understand that there will be significant systems and updates implemented when the government advises on Container Return Schemes. We are not convinced the 'Community Collection Points (CCP)' section has enough details for this to fall in to at this stage and may require more when a design has been approved.

5.5 states that *eligible residential properties may opt out of the Council's kerbside collection service provided that the Council approves a Waste Management Plan (WMP) for those properties*. More information on what would be expected would be useful. We would hope it includes allowances for recycling, organics and landfill, with emphasis on reduction.

It is great to see the Council's expectations for Waste management for multi-unit residential developments include collection of organics and recycling. 10.2 states the Council *may* require WMP approved but we feel that this should be compulsory given the known difficulties with waste collection in the central city.

We agree the 10.3 statement on expectations of existing multi-unit residential developments. Again, we feel that these should be expected to provide a WMP and adequately provide collection for recyclable and organic waste to maximise diversion from landfill.

We highly commend the Council for stating that Construction and demolition Waste Management Plans and Event Waste Management Plans include *methods which will be used to reduce waste going to landfill* (19.2.b). We hope the Council will emphasise the importance of this in the communications with companies and events.

We are also very happy to see the expectation that events will have to state *the steps which will be taken to prioritise the use of reusable systems* (20.3.C). This is an incredibly important way to, not only reduce waste to landfill but educate attendees.

We hope the data gathered under 19.3 and 20.5 will be made public in some form to provide insights and set a benchmark for working towards the Council's emissions targets.

Regarding the Council's inner city collection of waste and recycling – the official plastic bags pose a large litter risk and create more waste by being a disposable bag. We would like to see reusable alternatives to these explored.

Submission #49857

Te Whatu Ora
Health New Zealand

20 February 2023

Christchurch City Council
53 Hereford Street
Christchurch Central City
Christchurch 8013

Tēnā koutou,

Submission on the Christchurch City Council Draft Waste Management and Minimisation Bylaw 2023

1. Thank you for the opportunity to submit on the Draft Waste Management and Minimisation Bylaw. This submission has been compiled by Te Mana Ora (Community and Public Health). Te Mana Ora recognises its responsibilities to improve, promote and protect the health of people and communities of Aotearoa New Zealand under the Pae Ora Act 2022 and the Health Act 1956.
2. This submission sets out particular matters of interest and concern to Te Mana Ora.

General Comments

3. We welcome the opportunity to comment on the Christchurch City Council, Draft Waste Management and Minimisation Bylaw. The future health of our populations is not just reliant on health services, but on a responsive environment where all sectors work collaboratively.
4. While health care services are an important determinant of health, health is also influenced by a wide range of factors beyond the health sector. Health care services manage disease and trauma and are an important determinant of health outcomes. However, health creation and wellbeing (overall quality of life) is influenced by a wide range of factors beyond the health sector.

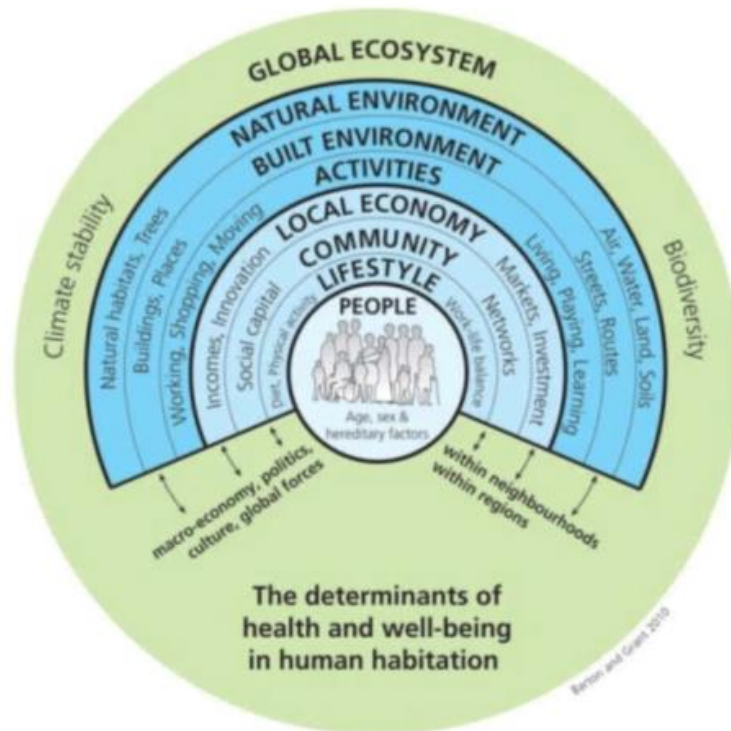
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Te Whatu Ora Health New Zealand

5. These influences can be described as the conditions in which people are born, grow, live, work and age, and are impacted by environmental, social and behavioural factors. They are often referred to as the 'social determinants of health'¹. The diagram² below shows how the various influences on health are complex and interlinked.
6. The most effective way to maximise people's wellbeing is to take these factors into account as early as possible during decision making and strategy development. Initiatives to improve health outcomes and overall quality of life must involve organisations and groups beyond the health sector, such as local government if they are to have a reasonable impact³.



¹ Public Health Advisory Committee. 2004. *The Health of People and Communities. A Way Forward: Public Policy and the Economic Determinants of Health*. Public Health Advisory Committee: Wellington.

² Barton, H and Grant, M. (2006) A health map for the local human habitat. *The Journal of the Royal Society for the Promotion of Health* 126 (6), pp 252-253. <http://www.bne.uwe.ac.uk/who/healthmap/default.asp>

³ McGinnis JM, Williams-Russo P, Knickman JR. 2002. The case for more active policy attention to health promotion. *Health Affairs*, 21(2): 78 - 93.

Submission #49857

Te Whatu Ora
Health New Zealand

Specific Comments

7. Te Mana Ora supports the changes in the Bylaw and wishes to make the following specific comments.
8. Community Collection Points – the revision of the definition of community collection points is likely to improve access to appropriate waste disposal in smaller communities where kerbside collection is not feasible. This will also allow Council to assist communities with waste collection for large scale events. Additionally, the incidence of fly-tipping is likely to reduce in areas that have adequate waste disposal options available.
9. Waste Management for Multi-unit Residential Developments – Te Mana Ora is pleased to see the inclusion of a threshold-based waste management plan clause for multi-unit developments and for some existing multi-unit residential developments. The occupancy rate of such dwellings can exceed anticipated occupancy rates and thus the waste generated may exceed manageable levels, leading to fly-tipping and excess waste if not managed adequately. A threshold-based waste management plan is a good prompt for this to be investigated further on a case-by-case basis.
10. Construction and Demolition Waste Management Plan – Te Mana Ora recommends the inclusion in the Bylaw of controls on dust generation to be a requirement to be considered in these Waste Management Plans. This will help limit the adverse impact of fugitive dust on the health of the public near the activity. Te Mana Ora also supports the development of Waste Management Plans by the owners or developers of construction or demolition sites, as this provides an additional mechanism to protect public health. However, we acknowledge that this may only be practical for commercial rather than residential properties, unless construction/demolition involves more than a single residential property.
11. Event Waste Management Plan - Te Mana Ora is pleased to see the inclusion of a threshold-based event waste management plan clause. A waste analysis report for these events is critical to identifying short-term issues as well as long term trends in waste disposal content. The threshold of 1000 attendees is a reasonable threshold to

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New Zealand Government

Submission #49857

Te Whatu Ora
Health New Zealand

ensure that large scale events are required to manage waste disposal adequately whilst allowing smaller scale events to proceed under good waste management practice. In line with other management plan templates, Te Mana Ora recommends that smaller scale events have a waste management plan available upon request to Council.

12. Nuisance and Litter – Te Mana Ora is pleased to see this included, however also queries the legal relationship with the Land and Water Regional Plan and section 29 of the Health Act 1956. Te Mana Ora recommend that Council clarify when this clause would be used and whether it gives effect to the LWRP and the Health Act 1956.

Conclusion

13. Te Mana Ora does not wish to be heard in support of this submission.
14. If others make a similar submission, the submitter will not consider presenting a joint case with them at the hearing.
15. Thank you for the opportunity to submit on the Draft Waste Management and Minimisation Bylaw.

Ngā mihi



Vince Barry

Regional Director Public Health Te Waipounamu
National Public Health Service

CODE OF PRACTICE for the DISTRIBUTION OF UNADDRESSED MAIL

Reviewed June 2020

Submission #49812

1. INTRODUCTION

New Zealand marketers and the general public recognise that unaddressed mail is a compelling advertising medium used by many organisations. With this in mind, the Marketing Association implemented a Code of Practice for the distribution of unaddressed mail. This is to ensure that its integrity as a marketing tool is maintained and strengthened.

KEY PRINCIPALS

All members of the Marketing Association and signatories to the Code, including the distributors of unaddressed mail, their customers, employees, franchisees and contractors agree to:

- Uphold the spirit of the Code in all respects;
- Respect at all time the individual rights and privacy of the consumer;
- Ensure any delivery with which they are associated is consistent with the high standard of performance required by this code;
- Observe appropriate national and local body legislation.

DEFINITIONS

Dumping: Means disposing of multiple copies of unaddressed mail in a public place (e.g. street, park, stream) when they are surplus to the number of letterboxes in any delivery route, or when the delivery person chooses to dispose of rather than deliver them.

N.B.: Distributors must regularly monitor the quantities required for an particular route to minimise the risk of dumping. Part of the training given to delivery staff must include the responsible disposal or return of surplus mail.

Letterbox/Mailbox: A letterbox or mailbox is the receptacle into which mail is delivered. It can be a single letterbox at the street-side of a residential property; one of a row of letterboxes at the street-side of a right-of-way where a number of houses are located; one of a row or bank of letterboxes in the lobby of an apartment block; or a letterbox at the roadside of a rural address.

The wide range of designs of letterboxes means that the training and judgment of the delivery person is particularly important when the size/capacity of the letterbox makes it unsuitable to receive any particular item, or when a letterbox is already full (see point 3 in the Code).

Multiple Copies: Bundled quantities of unaddressed mail dropped off at an area supervisor's location or at an individual distributor's address, awaiting delivery into letterboxes.

Signs Requesting Non-Delivery: Any sign displayed on a letterbox that unaddressed mail not be delivered to that letterbox. The wording of such signs can vary (e.g. **No Unaddressed Mail, Addressed Mail Only, No Junk Mail, No Circulars, Addressed Mail and Newspapers Only**). All such wording must be honoured.

Unaddressed Mail: Means any mail or material that does not have a street address (i.e. street/road name and number, suburb, city or rural delivery address). It includes advertising material such as circulars, leaflets, brochures, magazines, flyers or newspapers.

2. THE CODE

2.1 Letterbox/Mailbox Delivery

Unaddressed mail must not be delivered to a letterbox displaying the following signs:

2.2 'Addressed Mail Only'

n.b.: Public notices from Government or Local Bodies and Election material are permitted.

2.3 'Addressed Mail and Newspapers Only'

n.b.: Free print media, public notices and election material are permitted.

2.4 'No Junk Mail, No Circulars'

n.b.: Local community newspapers/magazines, charitable media, public notices and Election material are permitted.

3. OTHER DELIVERY POINTS

Unaddressed Mail must not be delivered to:

- 3.1 Vehicles parked in a public place;
- 3.2 A letterbox that is full or overflowing;
- 3.3 A letterbox that is unsecured or unsuitable to receive unaddressed mail; 3.4
A letterbox from which the contents will escape;
- 3.5 Any place other than a letterbox or a place associated with bulk distribution.

4. BULK DISTRIBUTION

- 4.1 Distributors must minimise waste by working closely with clients and printers to ensure product volumes are as closely matched as possible to the quantities required for delivery rounds;
- 4.2 Multiple copies dropped off for delivery must be secured in a safe place which has been authorised by the householder or other approved person;
- 4.3 In the event of unaddressed mail being dumped, the mail must be recovered by the relevant distributor and a full investigation undertaken to identify the reasons for the occurrence and to ensure that such an event is not repeated.

5. MANAGEMENT AND TRAINING

- 5.1 Distributors must take all practicable steps to train all delivery contractors to ensure they understand and maintain the accepted standards of conduct under this Code, and will provide a copy of this Code of Practice to all contractors;
- 5.2 Distributors must ensure an appropriate system of performance management is in place to resolve breaches of the code.

6. CONSUMER SERVICES

- 6.1 This code will be published on the Marketing Association website and regularly promoted to Government, business and charitable organisations;
- 6.2 The two major distributors of unaddressed mail are Reach Media (PH: 0800 732 2487) and Ovato (PH: 0800 767 546). Queries and complaints relating to unaddressed mail should be referred to these organisations.

MAILBOX COMPLAINTS

Please visit: www.marketing.org.nz/mailbox-complaints

Waste Management and Minimisation Bylaw 2023 Hearings Panel
Thursday 17 August 2023

Time	Name	Submitter Number
9:15 am (25)	Staff presentation and Panel questions for staff	
9:40 am (10)	Waipapa Papanui-Innes-Central Community Board Chairperson Emma Norrish	49925
9:50 am (10)	Waitai Coastal-Burwood-Linwood Community Board Chairperson Paul McMahon and Deputy Chairperson Jackie Simons	50053
10:00 am (5)	Halswell Community Project Manuka Cottage Addington Community House	50074
10:05 am (5)	John Miller	50071
10:10 am (5)	Central Riccarton Residents Association (TBC)	50065
10:15 am (5)	EINZ Ltd (TBC)	49991
10:20 am (5)	Winstone Wallboards Ltd (TBC)	50124
10:25 am (5)	Phillipstown Community Centre Charitable Trust (TBC)	50033
10:30 am	Panel questions for staff	

6. Hearing of Submissions Ngā Tāpaetanga

Submitters who indicated that they wished to be heard in person will present to the Hearings Panel. A schedule of presenters can be found at the beginning of the Volume of “*Heard Submissions*”.

7. Consideration and Deliberations Ngā Whaiwhakaaro me Ngā Taukume o Ngā Kōrero

At the conclusion of submitters being heard, the Hearings Panel will consider all submissions received on the proposal, and any additional information provided by submitters and Council Officers. The Hearings Panel will then deliberate on the proposal.

8. Hearings Panel Recommendations Ngā Tūtohu o Te Tira Tauaki

At the conclusion of deliberations the Hearings Panel will make a recommendation on the Draft Waste Management and Minimisation Bylaw 2023 to the Council.