



WAIRARAPA SOLID WASTE MANAGEMENT AND MINIMISATION BYLAW 2021 DELIBERATIONS

Order Paper for meeting to be held in the
Hurunui o Rangi Room, Carterton Events Centre
50 Holloway Street, Carterton on
WEDNESDAY 20 JANUARY at 10.30am

MEMBERSHIP

Cr Frazer Mailman (Chairperson) (MDC)

Cr Brent Gare (MDC)

Cr Chris Peterson (MDC)

Cr Rebecca Vergunst (CDC)

Cr Robyn Cherry-Campbell (CDC)

Cr Jill Greathead (CDC)

Cr Garrick Emms (SWDC)

Cr Alistair Plimmer (SWDC)

Cr Pam Colenso (SWDC)

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AGENDA

1. Conflicts of Interest (Members to declare conflicts, if any)
2. Apologies
3. Late Items
4. **Confirmation of the Report of the Joint Hearing Panel Proposed Wairarapa Solid Waste Management and Minimisation Bylaw Hearings held at the Carterton Courthouse on Wednesday 16 December 2020 (190/20)**
5. **DELIBERATIONS: PROPOSED WAIRARAPA SOLID WASTE MANAGEMENT AND MINIMISATION BYLAW 2021 (001/21)** Pages 601-611

**REPORT OF THE JOINT HEARING PANEL PROPOSED WAIRARAPA SOLID WASTE MANAGEMENT
AND MINIMISATION BYLAW HEARINGS HELD AT THE CARTERTON COURTHOUSE ON
WEDNESDAY 16 DECEMBER 2020 AT 5.00PM**

PRESENT

Councillor Frazer Mailman (Chair, MDC), Councillor Brent Gare (MDC), Councillor Chris Peterson (MDC) Councillor Rebecca Vergunst (CDC), Councillor Robyn Cherry-Campbell (CDC), Councillor Jill Greathead (CDC), Councillor Garrick Emms (SWDC), Councillor Alistair Plimmer (SWDC) and Councillor Pam Colenso (SWDC).

IN ATTENDANCE

David Hopman (MDC Manager Assets and Operations), Dave Gittings (CDC Infrastructure, Services and Regulatory Manager), Bryce Neems (SWDC Amenities and Solid Waste Manager), Nerissa Aramakutu (MDC Policy Manager), Jo Deans (Regional Zero Waste Advisor) and MDC Governance Advisor.

CONFLICTS OF INTEREST

No conflicts were declared.

APOLOGIES

There were no apologies.

LATE ITEMS

There were no late items.

HEARING OF SUBMISSIONS

The Hearing Panel heard the following submitters who spoke to their submissions:

Sub #	Name
13	Golden Shears – Kim and Stephen Siemonek. <i>A presentation was given and is attached as Minutes Attachment 1.</i>
17	Natalia Waaka

Moved by Councillor Alastair Plimmer

That the Wairarapa Policy Working Group (Joint Hearing Panel):

- a. receives submissions on the proposed Wairarapa Solid Waste Management and Minimisation Bylaw 2021, noting 18 submissions were received and of those 2 have requested to be heard by the Wairarapa Policy Working Group (Joint Hearing Panel).**

Seconded by Councillor Robyn Cherry-Campbell and CARRIED

The meeting closed at 5.27pm



Solid Waste Management & Minimisation Bylaw 2021

Golden Shears International Shearing
Competition



200 people per event not 1000

Reasoning

- To make people more aware of waste with their event
- Education is the most important approach to awareness
- That people would hold smaller events to avoid Waste Planning
- Preparing for bigger event management



Suggestion

- Pre-set form to complete for 100-999 people for all events
- Outlining the Requirements
- Education for awareness
- Event planners can include this in their meetings
- To be submitted to Council



Shears is starting an Event
Waste Management Plan

Why outdoor only

For example, the Golden Shears

Here is our statistics

Indoor events like ours can
produce multiple kgs of rubbish
and recyclable waste

2019 – 750 kgs – 3 day event

2020 – 1300kgs – 3 ½ day plus
60th Celebrations

Wanting to be leader in Waste Management for future environments



1000 people or more

Full Event Management to be completed

Licence issued by Councils

Education available for planners and attendees

Planners to attend Event Waste Management Workshop

To:	Wairarapa Policy Working Group
From:	Nerissa Aramakutu, Policy Manager
Endorsed by:	Angela Jane, Manager Strategic Planning, Masterton District Council David Hopman, Manager Assets and Operations, Masterton District Council Dave Gittings, Infrastructure, Services and Regulatory Manager, Carterton District Council Euan Stitt, Group Manager Partnerships and Operations, South Wairarapa District Council
Date:	20 January 2021
Subject:	Deliberations: Proposed Wairarapa Solid Waste Management and Minimisation Bylaw 2021

DECISION

Recommendations:

That the Wairarapa Policy Working Group:

1. Receives Report 001/21;
2. Determines that it has followed consultation requirements set out in the Local Government Act 2002;
3. Recommends that the three Wairarapa District Councils adopt the proposed Wairarapa Solid Waste Management and Minimisation Bylaw (and associated bylaw controls) with the following amendments:

Clause 6 Interpretation

 - a. Add the following waste hierarchy definition as an additional reference: *"a list of waste management options with decreasing priority – usually shown as reduce, reuse, recycle, reprocess, treat, dispose"*
4. Recommends that the three Wairarapa District Councils agree that:
 - a. Councils will ensure that the compliance, monitoring and enforcement of the Bylaw is sufficiently resourced
 - b. Councils will consider possible incentives and support for diversion when developing the regional licensing fee structure
 - c. The diversion of resources from landfill will be considered when developing the waste operator licensing framework
 - d. Councils will ensure that there is information available and communicated to operators that the waste operator licensing in the bylaw is additional to the offensive trade licensing
 - e. Councils will continue to encourage all event waste managers to consider waste minimisation and will provide advice and assistance with recycling and organise waste bin hire
 - f. Councils will also continue to better promote and educate on the benefits of waste minimisation plans for events of all sizes
 - g. Councils will look at ways in which better waste management and minimisation education and promotion can be targeted at the building/construction sector
 - h. Councils will look at ways in which we can better provide promotion and education for recyclable materials for hardcopy advertising/mail
 - i. Councils will promote bylaw management of unaddressed mail and advertising material to residents to encourage the uptake of using signage on their letterboxes to reduce the receipt of unaddressed mail or advertising mail
 - j. Councils will look at ways in which better waste management and minimisation education and promotion for businesses and the wider community.

PURPOSE

The purpose of this report is to:

1. present the Wairarapa Policy Working Group with a summary and analysis of the submissions received on the proposed Wairarapa Solid Waste Management and Minimisation Bylaw 2021 (and associated bylaw controls); and
2. provide advice to the Wairarapa Policy Working Group to enable recommendations to be made to the three Wairarapa District Councils ahead of adopting the final Wairarapa Solid Waste Management and Minimisation Bylaw (and associated bylaw controls).

CONTEXT

Background

The three Wairarapa District Councils adopted the proposed Wairarapa Solid Waste Management and Minimisation Bylaw 2021 Statement of Proposal (including the draft bylaw and bylaw controls) for consultation in October 2020.

The proposed Wairarapa Solid Waste Management and Minimisation Bylaw 2021 will enable the three Wairarapa District Councils to meet legislative obligations, to more effectively manage the negative impacts of waste on the environment and ensure the protection of the health and safety of the community and those involved in waste management.

The proposed Wairarapa Solid Waste Management and Minimisation Bylaw 2021 will supersede the Masterton and South Wairarapa District Council Solid Waste Bylaw 2012. Even though the three Wairarapa District Councils will have a joint Bylaw – each council will individually regulate and enforce the bylaw within their own District.

As part of the implementation of the Wellington Region Waste Management and Minimisation Plan 2017-23, the eight councils across the Wellington Region agreed to review and develop a suite of regionally consistent solid waste bylaws.

Each of the three Wairarapa District Councils agreed to delegate authority to the Wairarapa Policy Working Group to hear and consider submissions and make recommendations back to each of the councils on the final Wairarapa Solid Waste Management and Minimisation Bylaw 2021.

Next Steps

Following deliberations on the proposed Wairarapa Solid Waste Management and Minimisation Bylaw 2021, the Wairarapa Policy Working Group will make recommendations back to the three Wairarapa District Councils ahead of adopting the bylaw and associated bylaw controls in February and March 2021¹.

CONSULTATION

Consultation Process

As a bylaw change, the three Wairarapa District Councils were required to follow the Special Consultative Procedure, as prescribed in Section 83 of the Local Government Act 2002, for the proposed Wairarapa Solid Waste Management and Minimisation Bylaw 2021.

¹ 10 February 2021 (SWDC), 17 February 2021 (MDC), 17 March 2021 (CDC)

The three Wairarapa District Councils adopted the proposed Wairarapa Solid Waste Management and Minimisation Bylaw 2021 Statement of Proposal for consultation on 28 October 2020. Submissions were invited from 30 October 2020 up until 30 November 2020. The Hearing was held on 16 December 2020.

Copies of the Statement of Proposal, proposed bylaw, proposed bylaw controls, and submission form were made available via the three Wairarapa District Council websites to view or download. Hardcopy versions of these documents were also made available from each of the three Wairarapa District Council offices and libraries. The consultation period was promoted via local newspapers, social media, and email.

Submissions

A total of 18 submissions were received on the proposed Wairarapa Solid Waste Management and Minimisation Bylaw 2021. All submissions were received either via the online submission facility and email. Of these:

- 16 were individuals and two were organisations;
- The majority of submitters (15 out of 18) indicated that they are ratepayers/residents of Masterton District Council²;
- Demographic information provided by submitters reflected:
 - o Age: The majority of submitters were aged 51+ (62 percent) with just under 20 percent in the 20-35 and 36-50 age brackets respectively³;
 - o Ethnicity: The majority of submitters indicated they were of NZ European ethnicity, with two submitters indicating Māori ethnicity and one submitter with Pasifika ethnicity⁴;
 - o Gender: The majority of submitters were male (60 percent)⁵;
 - o The majority of submitters (72 percent) indicated that this was not the first submission that they have made to any of the three Wairarapa District Councils.

Hearings

The Wairarapa Solid Waste Management and Minimisation Bylaw 2021 Hearing was held at the Carterton Courthouse, Holloway Street, Carterton on Wednesday, 16 December 2020 at 5pm. Two submitters were heard as part of the Hearings process. A copy of the Hearing Agenda is available here:

<https://mstn.govt.nz/wp-content/uploads/2020/12/AGENDA-Joint-Hearing-Panel-2020-12-16-Solid-Waste-Bylaw-2021-Hearing.pdf>

SUBMISSION RESULTS

Overview

The three Wairarapa District Councils sought community views for the following areas:

1. Waste management for events
2. Management of construction and demolition waste
3. Management of unaddressed mail and advertising material
4. Licensing of waste collectors and operators
5. Support for the proposed bylaw and bylaw controls.

Results from submissions and proposed recommendations are broken down by each of these areas in the following sections.

² Three submitters skipped the question asking whether they are making a submission as a ratepayer/resident of any of the three Wairarapa District Councils

³ 16 of the 18 submitters answered the age question

⁴ Two submitters skipped the ethnicity question

⁵ Three submitters skipped the gender question

Waste management for events

Proposed Changes

The proposed Wairarapa Waste Management and Minimisation Bylaw 2021 seeks to ensure waste is effectively planned for and managed at large-scale events. The proposed bylaw seeks to enable councils to request an event and waste analysis report for large-scale events that attract more than 1,000 over its duration (regardless of whether it is single or multi-day).

The proposed Wairarapa Waste Management and Minimisation Bylaw 2021 sets out what needs to be covered in the event waste minimisation plan and waste analysis report.

The current Masterton and South Wairarapa District Council Solid Waste Bylaw 2012 does not contain any regulatory requirements for dealing with waste generated by events.

Summary of Feedback

Submitters were asked the extent to which they agree or disagree with the proposed event waste management and minimisation planning requirements for large events. 17 submitters (out of the total 18 submitters) responded to this question. Of these, 77 percent agreed/strongly agreed with the proposed event waste management and minimisation planning requirements for large events.

Waste management for events					
Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Did not know
0	Six percent (1 submitter)	12 percent (2 submitters)	12 percent (2 submitters)	65 percent (11 submitters)	6 percent (1 submitter)

Summary of comments and staff advice

Waste management for events	
Summary of Comments	Staff advice
All events (no matter the size of the event) should have an event waste minimisation plan in place to reduce waste	The lack of event waste management and minimisation practices is a regional issue. Councils will continue to encourage all event waste managers to consider waste minimisation and will provide advice and assistance with recycling and organise waste bin hire. Councils will also continue to better promote and educate on the benefits of waste minimisation plans for events of all sizes.
Council should promote access to online resources to support event organisers	Online resources to support event organisers are available. Councils will continue to better promote and educate on the benefits of waste minimisation plans for events of all sizes.
The event attendees threshold to trigger the event waste minimisation plan requirement should be lowered to events with 100 attendees or more	At this stage, the event attendees threshold will remain at 1,000 for mandatory event waste minimisation plans in alignment with the majority of the wider Wellington region.

	Councils will continue to encourage all event waste managers to consider waste minimisation and will provide advice and assistance with recycling and organise waste bin hire.
Costs related to rubbish disposal following large events should not fall on the ratepayer	Rubbish disposal following large events is covered by the event organisers.
Some of the messaging in the communications about the proposed Wairarapa Solid Waste Bylaw 2021 needs to be improved	Comments noted and acknowledged.

Recommendations: waste management for events

Recommendations: waste management for events - Councils will continue to encourage all event waste managers to consider waste minimisation and will provide advice and assistance with recycling and organise waste bin hire. - Councils will also continue to better promote and educate on the benefits of waste minimisation plans for events of all sizes.	
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Management of construction and demolition waste

Proposed Changes

The proposed Wairarapa Waste Management and Minimisation Bylaw 2021 and associated bylaw controls will require all large construction projects (valued at \$2 million+) to consider waste management and minimisation planning as part of their project planning and to submit an associated construction site and demolition waste management plan to the council for approval.

The proposed Wairarapa Waste Management and Minimisation Bylaw 2021 sets out what needs to be covered in the construction site and demolition waste management plan.

The current Masterton and South Wairarapa District Council Solid Waste Bylaw 2012 does not contain any requirements for dealing with waste generated by construction and demolition waste.

Summary of Feedback

Submitters were asked the extent to which they agree or disagree with the proposed requirement to consider waste management and minimisation planning for high value buildings. Sixteen submitters (out of the total 18 submitters) responded to this question. Of these, the majority of submitters agree (five submitters or 31 percent) or strongly agree (69 percent) with the proposed requirement to consider waste management and minimisation planning for high value building projects.

Management of construction and demolition waste					
Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Did not know
0	0	0	31 percent (five submitters)	69 percent (11 submitters)	0

Summary of comments and staff advice

Management of construction and demolition waste	
Summary of Comments	Staff advice
Any new builds resulting in the demolition of old buildings should have better practices in place to reduce the amount of dust and debris created that affects the surrounds (e.g. new Greater Wellington Regional Council building site).	Councils will look at ways in which better waste management and minimisation education and promotion can be targeted at the building/construction sector.
Suggests that smaller value construction projects should also consider waste management and minimisation planning.	Councils will look at ways in which better waste management and minimisation education and promotion can be targeted at the building/construction sector.
Construction waste should be recycled for new dwellings and large additions instead of going to landfill.	Councils will look at ways in which better waste management and minimisation education and promotion can be targeted at the building/construction sector.
Suggestion to have more of an emphasis on deconstruction as opposed to demolition.	Comments noted.

Recommendations: Management of construction and demolition waste

Recommendations: Management of construction and demolition waste
Councils will look at ways in which better waste management and minimisation education and promotion can be targeted at the building/construction sector.

Management of unaddressed mail and advertising materialProposed Changes

The proposed Wairarapa Waste Management and Minimisation Bylaw 2021 will formally restrict the deposit of unaddressed mail or advertising mail in letter boxes that are clearly marked with the words “no circulars”, “no junk mail” or “addressed mail only”. However, there are exceptions for public notices from the government, as well as for different types of information from community organisations and charities.

The current Masterton and South Wairarapa District Council Solid Waste Bylaw 2012 does not contain any requirements for dealing with waste, litter and nuisance issues generated by unaddressed mail and advertising material.

Summary of Feedback

Submitters were asked to what extent do they agree or disagree with the new restriction of depositing unaddressed mail or advertising mail in letter boxes that are clearly marked with the words “no circulars”, “no junk mail” or “addressed mail only”. Sixteen submitters (out of the total 18 submitters) responded to this question. Of these, 100 percent agree/strongly agree of submitters with these new restrictions.

Management of unaddressed mail and advertising material					
Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Did not know
0	0	0	12.5 percent (2 submitters)	87.5 percent (14 submitters)	0

Summary of comments and staff advice

Management of unaddressed mail and advertising material	
Summary of Comments	Staff advice
More promotion and education needed to encourage companies/organisations to use recyclable materials for hardcopy advertising/mail	Staff note that there are hardcopy advertising/mail made of recyclable materials in circulation currently. Councils will look at ways in which we can better provide promotion and education for recyclable materials for hardcopy advertising/mail.
Fine companies/organisations who do not use recyclable materials for hardcopy advertising/mail	Councils do not have the authority to fine companies/organisations who do not use recyclable materials for hardcopy advertising/mail.
Ban all unaddressed/advertising mail (except government, community and charity notices)	The proposed Wairarapa Waste Management and Minimisation Bylaw will formally restrict the deposit of unaddressed mail or advertising mail in letter boxes that are clearly marked with the words “no circulars”, “no junk mail” or “addressed mail only”. Councils will promote bylaw management of unaddressed mail and advertising material to residents to encourage the uptake of using signage on their letterboxes to reduce the receipt of unaddressed mail or advertising mail. Councils currently provide information on each of their website and have stickers available at council offices for the community to use.

Recommendations: Management of unaddressed mail and advertising material

Recommendations: Management of unaddressed mail and advertising material
- Councils will look at ways in which we can better provide promotion and education for recyclable materials for hardcopy advertising/mail. - Councils will promote bylaw management of unaddressed mail and advertising material to residents to encourage the uptake of using signage on their letterboxes to reduce the receipt of unaddressed mail or advertising mail.

Waste Operating Licensing

Proposed Changes

The proposed Wairarapa Solid Waste Management and Minimisation Bylaw 2021 includes provision to establish a licensing system for waste operators. This would involve mandatory licensing for any person or entity that collects or transports more than 20 tonnes of waste per year within the Wairarapa region. Licensing would not apply to individuals who collect or transport waste for personal reasons. The primary purpose of this proposed licensing system is for the council's to collect relevant waste-related data from the private sector and to ensure private waste operators are operating in a manner that is consistent with the Council's waste-related objectives.

The current Masterton and South Wairarapa District Council Solid Waste Bylaw 2012 does not contain any requirements for licensing of service providers/operators.

Summary of Feedback

Submitters were asked to what extent do they agree or disagree with the establishment of waste operator and facility licensing. Sixteen submitters (out of the total 18 submitters) responded to this question. Of these, 94 percent agree (44 percent) or strongly agree (50 percent) with the establishment of waste operator and facility licensing. The remaining six percent did not know.

Waste Operating Licensing					
Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Did not know
0	0	0	44 percent (7 submitters)	50 percent (8 submitters)	6 percent (1 submitter)

Summary of comments and staff advice

Waste Operating Licensing	
Summary of Comments	Staff advice
Do not think that the current waste operators are doing a good job	Comments noted.

Recommendations: Waste Operator Licensing

Recommendations: Waste Operator Licensing
No recommendations.

Overall support for the proposed bylaw and bylaw controls

Proposed Changes

The submission form included a question to indicate the extent to which submitters support or oppose the proposed Wairarapa Waste Management and Minimisation Bylaw 2021 (and associated controls).

Summary of Feedback

Sixteen submitters (out of the total 18 submitters) responded to this question. Of these, 87.5 percent agree/strongly agree with the proposed Wairarapa Waste Management and Minimisation Bylaw 2021 (and associated controls). Twelve percent of submitters were neutral.

Overall support for the proposed bylaw and bylaw controls					
Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Did not know
0	0	12.5 percent (2 submitters)	37.5 percent (6 submitters)	50 percent (8 submitters)	0

Summary of comments and staff advice

Overall support for the proposed bylaw and bylaw controls	
Summary of Comments	Staff advice
Support for the proposed changes in the bylaw	Support noted.
Need to have rubbish and recycling plans for all small and large businesses	Councils will look at ways in which better waste management and minimisation education and promotion for businesses and the wider community.
More waste minimisation education (including disposal) needed to support businesses, young people and the wider community	Councils will look at ways in which better waste management and minimisation education and promotion for businesses and the wider community.
Remove general rubbish bins and replace with separate bins that promote recycling	Masterton District Council is looking at this as part of the wider CBD upgrade project and will be included in the 2021-31 Long-Term Plan. Carterton District Council are already doing this. South Wairarapa District Council will be looking at this as part of its Waste Minimisation Action Plan in the 2021/22 financial year.
Waste needs to be more clearly defined	Comment noted. The bylaw will include an additional reference around the waste hierarchy: <i>“a list of waste management options with decreasing priority – usually shown as reduce, reuse, recycle, reprocess, treat, dispose”</i> .
Need to encourage retail and food sectors to move away from non-recyclable packaging of goods	Councils will look at ways in which better waste management and minimisation education and promotion for businesses and the wider community.
Dissatisfaction with what the waste operator will collect and allow for disposal in terms of recycling (e.g. plastic containers larger than 3L)	Currently we are unable to process anything larger than 3L in our machinery.
Waste operator should have a commitment to minimising waste	The waste operator is required to collect all waste generated by the community and minimisation is dependent on the levels of diversion, sorting and cleaning of recycling.

Recommendations: overall support for the proposed bylaw and bylaw controls

Recommendations: overall support for the proposed bylaw and bylaw controls
Councils will look at ways in which better waste management and minimisation education and promotion for businesses and the wider community.

OTHER CONSIDERATIONS

Waste Operator Licensing

Staff noted that a licensing regime is already in place with regard to restrictions on carrying offensive trade under section 54 of the Health Act 1956. It requires anyone operating an offensive trade (e.g. refuse collection and disposal) to have a certificate of registration from their respective council.

The Waste Operator Licensing provisions proposed in the Wairarapa Solid Waste Management and Minimisation Bylaw 2021 will be additional to this licensing and will not supersede these current licensing provisions.

Waste Operator Licensing Recommendations

Waste Operator Licensing Recommendations:

- Councils ensure that there is information available and communicated to operators that the waste operator licensing in the bylaw is additional to the offensive trade licensing.

Wellington regional themes and further proposed changes

An overview of the regional themes from submissions received across the Wellington region through each councils individual submission processes was compiled as well as a set of corresponding recommendations made by staff in response to these regional themes. Those applicable to the Wairarapa Region are outlined in the following table:

Wellington Regional Themes	
Section of bylaw/bylaw control	Summary of Comments
Clause 6 Interpretation	Most submitters somewhat agreed with the interpretations, asking that in most cases they be strengthened. This includes submissions requesting the definition of what an event is rather than what it is not, requests for small events to be required to submit a waste minimisation plan, including sports and indoor events. Other feedback received suggested that was that the bylaw would not properly address waste issues and would be difficult to enforce. For licensing, submissions included requests that Council/s ensure that a flexible approach is taken for community-based waste organisations, and smaller providers.
Clause 7 Controls	General feedback received by councils included requests specific to the separation of waste and compostable packaging. Comments were received around the size and types of accepted receptacles, and there was an out of scope request for stricter rules on single-use plastic.
Clause 8 General Responsibilities	Some feedback was received on litter as a result of co-mingled recycling crates, some submitters thought the Bylaw should signal a clearer intent around waste reduction, and others thought waste management and minimisation obligations for residential and commercial entities should be more clearly distinguished.
Clause 11 Licensing of Waste Collectors and Operators	Most submitters agreed with the introduction of region-wide licensing and the need for greater oversight. Some had concerns about it impacting smaller providers and organisations that act as consolidation points. There was general support for the proposed licensing. Some were concerned that this might impact on the cost to the customer or

	questioned the practicality of this. A few comments were received around the current state of rubbish and recycling collection that weren't necessarily relevant to licensing but can be considered in future discussion. One submitter asked to consider incentivising diversion when developing the licensing framework, another that the Bylaw comes into effect sooner than proposed.
Clause 12 Events	Many submitters somewhat agreed with the proposal to regulate significant outdoor events but asked that it be strengthened in parts. Suggestion that plans be renamed, that the date for submitting plans is reconsidered, that equipment to support prevention is included in 12.2 d, that the estimated amount of waste avoided should be included in the plan, and that it comes into effect sooner than proposed. Supportive comments across councils were received for mandatory post-event waste analysis reports.
Clause 13 Construction site and demolition waste	General support was received for the proposal to regulate high value construction and demolition waste projects to consider and report back to the councils on related waste management and minimisation activities. The councils were also asked to specify that building work includes refurbishments. There is a request to consider another means of triggering the need for a plan – such as a combination of value and type. One asked that it be mandatory for principal contractors to undertake activities in 13.4 and 13.5. Another wanted to see diversion targets in plans. One submitter commented that all projects should have this requirement in order to make any real impact, that changes would need to be supported through education, and that there should be additional requirements for separating material. Another thought it was more red tape.
Clause 16 Unaddressed Mail and Advertising Material	There was strong support for the proposal to regulate unaddressed mail and advertising mail.

Wellington Regional Themes Recommendations

Wellington Regional Themes Recommendations: • Councils to consider possible incentives and support for diversion when developing the regional licensing fee structure. • Add the following waste hierarchy definition as an additional reference under clause 6 Interpretation: “a list of waste management options with decreasing priority – usually shown as reduce, reuse, recycle, reprocess, treat, dispose” • Ensure that reference is made to reusable systems and the estimated amount of waste that will be avoided in the plans. • Councils ensures that the compliance, monitoring and enforcement of the Bylaw is sufficiently resourced. • The diversion of resources from landfill will be considered when developing the waste operator licensing framework.
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