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# Submission for Submission Form - Solid Waste Bylaw Review 2026

## Form Results

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**Please give us your feedback on the Draft Solid Waste Bylaw 2026**

April 2026

Waitomo District Council – Solid Waste Bylaw Review 2026

Tēnā koutou Waitomo District Council,

Go Eco appreciates the opportunity to submit on the Draft Solid Waste Bylaw 2026. This submission builds on our previous feedback, including our April 2025 Annual Plan submission, and is explicitly informed by the Maniapoto Environmental Management Plan (MEMP).

The MEMP is a direction-setting document that outlines the expectations of Maniapoto for environmental management, including the protection and restoration of mauri, the exercise of kaitiakitanga, and the intergenerational wellbeing of the environment and people as indivisible (p.12–13). These principles must be reflected in Council bylaws and decision-making.

**Key Concerns**

The bylaw remains focused on waste management (collection, control, and disposal) rather than enabling a transition to systems that actively protect and restore mauri. The MEMP emphasises that environmental management must sustain ecosystems for future generations and recognise the inseparable relationship between people and the environment (p.12). The current bylaw does not reflect this holistic approach.

The bylaw does not address waste displacement. Exporting waste outside the district contradicts the MEMP principle that all environments possess mauri and must be protected from degradation and pollution, regardless of location (p.13). As noted in

our previous submission, this shifts harm rather than resolving it.

Transfer stations are framed primarily as infrastructure for waste aggregation and transport. This does not align with the MEMP's emphasis on restoring environmental health and adopting best practicable options and precautionary approaches to avoid further degradation (p.35–37).

Te Tiriti o Waitangi obligations are not meaningfully operationalised. The MEMP clearly states that Maniapoto must have influence over decisions affecting their taonga and that co-governance and partnership are essential to environmental management (p.18–19). The bylaw does not currently reflect this expectation.

Climate change is not explicitly integrated. The MEMP includes climate change as a core environmental domain and promotes precautionary, holistic, and long-term approaches to environmental management. The absence of climate considerations in the bylaw is inconsistent with this direction.

Organic waste is not sufficiently prioritised. Given the MEMP's focus on restoring land, water, and ecosystems, the lack of strong provisions for organic diversion represents a missed opportunity to reduce pollution and regenerate soils.

Licensing and operational provisions are not strongly aligned with kaitiakitanga outcomes.

While zero waste is referenced, there are limited mechanisms to ensure that operators actively contribute to protecting environmental and cultural values.

Equity and environmental justice are not adequately addressed. The MEMP highlights the cumulative impacts of environmental degradation and the disproportionate burden placed on Maniapoto through historical development (p.13). The bylaw does not currently address how such inequities will be avoided.

## Recommendations

Amend the purpose and scope of the bylaw to explicitly align with the Maniapoto Environmental Management Plan by prioritising the protection and restoration of mauri, intergenerational wellbeing, and the interconnected relationship between people and the environment.

Embed a clear commitment to waste minimisation and zero waste systems, including reduction at source, reuse, repair, and local circular economies, consistent with kaitiakitanga and sustainable resource use.

Include provisions that recognise the mauri of all environments and prevent the displacement of waste-related harm to other regions. Waste management decisions should reflect a whole-of-system responsibility, not just district-level outcomes.

Strengthen the role of transfer stations by requiring them to function as resource recovery hubs that prioritise reuse, recycling, composting, and education. This aligns with the MEMP's emphasis on restoration, best practice, and environmental enhancement.

Operationalise Te Tiriti o Waitangi by requiring genuine partnership with mana whenua in the design, governance, and implementation of waste systems. Integrate climate resilience into the bylaw by linking waste minimisation to emissions reduction, prioritising local solutions, and adopting precautionary approaches to avoid long-term environmental harm.

Strengthen provisions for both green waste and food scrap diversion by enabling or requiring separation and supporting community-scale composting systems that return nutrients to the soil, contributing to ecosystem restoration in line with MEMP objectives.

Enhance licensing requirements to ensure operators demonstrate alignment with kaitiakitanga, including measurable waste reduction outcomes, transparency of waste destinations, and contribution to local circular systems. To prevent systemic dependency on large-scale commercial entities, the Council will:

- Prohibit "Take-or-Pay" Clauses: No contract or license shall include minimum volume guarantees that penalise the community for reducing waste.
- Phased/Modular Contracting: Prefer shorter-term (3–5 year) or modular contracts that allow for the integration of emerging local enterprises and community-scale circular solutions.
- Local Preference Scaling: Licensing fees and procurement weighting will favour operators who process waste within the region, minimising the carbon footprint and keeping economic value within the community.

Strengthen event waste provisions to reflect zero waste expectations and minimise environmental impact. Including the availability of sorting infrastructure and support.

In rural communities where alternative waste disposal or recycling options are limited or non-existent, the Council will prioritise supportive infrastructure and education over punitive measures. We recognise that enforcement without viable alternatives creates systemic inequity; therefore, investment in accessible community solutions must precede or accompany any new regulatory requirements.

Incorporate equity considerations by ensuring that waste systems do not disproportionately impact Māori or other communities, and that all decisions reflect the MEMP's recognition of cumulative environmental effects and the need to restore balance.

## Conclusion

The Maniapoto Environmental Management Plan provides a clear framework for how environmental management should occur within

the rohe. It emphasises that people and the environment are interconnected, that mauri must be protected and restored, and that Maniapoto must be active partners in decision-making.

To give effect to this, the Solid Waste Bylaw must move beyond managing waste toward enabling systems that restore environmental health, uphold Te Tiriti, and build long-term resilience.

We urge Council to align this bylaw with the MEMP and take a leadership role in advancing a zero-waste, regenerative future for the Waitomo District.

Jo Wrigley  
Kaiwhakakaha || CE