

1 June 2025

Via Ministry for the Environment website

## SUBMISSION TO MINISTRY FOR THE ENVIRONMENT ON PROPOSED AMMENDMENTS TO WASTE LEGISLATION

Thank you for the opportunity to present this submission on the proposed amendments to waste legislation. The Queenstown Lakes District Council (QLDC or Council) is generally supportive of the proposed amendments to waste legislation.

QLDC is pleased to see that the proposed amendments to the Litter Act 1979 into Waste Minimisation Act 2008 are responsive to enforcement issues faced in the Queenstown Lakes District (QLD). In particular, the proposed amendments to ensure mismanaged waste have effective deterrents and enforcement:

- a) the ability for a Litter Control Officer (LCO) to enforce littering penalties at a lower evidential threshold,
- b) the prevention of litter that spills over or is blown over from private land on to public or private land and enforcement of associated offences; and
- c) ensuring sufficient cost-recovery provisions.

QLDC strongly recommends the methodology for allocating funds from the waste disposal levy (the levy) to territorial authorities includes visitor populations in addition to resident population to adequately address constraints for councils with visitor economies and small ratepayer bases. The current levy funds represent less than 3% of QLDC's total expenditure on waste management and minimisation activities. This exemplifies the significant investment required in the district, beyond what the levy funds provide, to achieve waste management and minimisation objectives.

QLDC has contributed to and supports the broader Otago submission drafted by the Regional Waste Officer and makes this submission to emphasise the significant impact that high visitor numbers have on funding waste management in the QLD.

QLDC would not like to be heard at any hearings that result from this consultation process.

Thank you again for the opportunity to comment.

Yours sincerely,



Tony Avery  
**Property and Infrastructure General Manager**

# SUBMISSION TO MINISTRY FOR THE ENVIRONMENT ON PROPOSED AMMENDMENTS TO WASTE LEGISLATION

## 1.0 Context of the proposed amendments to waste legislation in relation to QLDC

- 1.1 The Queenstown Lakes District (QLD) has a high visitor population comparative to other districts around Aotearoa, New Zealand. The district's average day population is approximately 81,660, comprised of 54,440 residents and an average day-visitor population of 27,220. At its peak, the daily visitor population can reach 68,050. It is projected that the district resident and visitor populations will continue to increase, approximately by 2.5% each over ten years<sup>1</sup>.
- 1.2 The district is committed to moving towards zero waste and being a sustainable district, as outlined in Queenstown Lakes District Council (QLDC) Waste Minimisation and Management Plan (WMMP) 2018<sup>2</sup>. Zero waste is important to the district's communities, who have set a vision statement in Vision Beyond 2050<sup>3</sup> that zero waste is business as usual. The district is also committed to zero waste through its Climate and Biodiversity Plan 2022-2025<sup>4</sup> and the district's Destination Management Plan: Travel to a Thriving Future<sup>5</sup> which has an objective for the visitor economy to be zero waste by 2030.
- 1.3 Since the WMMP 2018, QLDC has made progress with actions to divert and minimise material going to landfills. A key investment area for Council is a local community grant programme with half of the \$400,000 annual budget supported by waste disposal levy (the levy) funds and the remainder funded from rates. An example of this is funding provided to KiwiHarvest food rescue to enable them to expand their services. As a result, nearly 150 tonnes of food from local donors like supermarkets, cafes, and orchards has been rescued and redistributed to thirteen local charities. Local grants have also supported construction and demolition diversion projects, such as Naylor Love's 'Community Upcycling Station'.

## 2.0 Include consideration for visitor populations in the proposed method for allocating funds from the waste disposal levy (the levy) to territorial authorities.

- 2.1 The levy currently funds less than 3% of the total expenditure across waste management and minimisation activities for QLDC. This exemplifies the significant investment is required in the district, beyond what waste disposal levy funds provide, to ensure infrastructure can meet the additional demands of the visitor population and achieve waste minimisation outcomes.
- 2.2 QLDC acknowledges that the proposed method for allocating funds from the waste disposal levy is a positive direction change to recognise the challenges for smaller ratepayer base. It strongly recommends that visitor populations are included in the methodology to adequately reflect these pressures. For the QLD, if the resident and visitor population data from 2025 was included in the methodology, this would result in a 33% increase in population input.

## 3.0 Recommendations:

- R.1. Revise the methodology for allocating funds from the waste disposal levy (the levy) to territorial authorities, to include the visitor population.

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<sup>1</sup> QLDC Demand Projections May 2025 <https://www.qldc.govt.nz/community/population-and-demand/>

<sup>2</sup> QLDC's Waste Management and Minimisation Plan 2025 is currently out for public consultation.

<sup>3</sup> [Our Vision and Mission - QLDC](#)

<sup>4</sup> [Climate Change and Biodiversity \(qldc.govt.nz\)](#)

<sup>5</sup> [Queenstown Lakes Regenerative Tourism Plan\\_420c7b6c-d0a1-4656-bd5d-4026e9ef993f.pdf \(simpleviewinc.com\)](#)