Submission on Options to Reduce Emissions from Organic Waste

July 2026

Introduction

The Aggregate and Quarry Association (AQA) is the industry body representing construction material companies which produce an estimated 48 million tonnes of aggregate and quarried materials consumed in New Zealand each year.

Funded by its members, the AQA has a mandate to increase understanding of the need for aggregates to New Zealanders, improve our industry and users' technical knowledge of aggregates, and assist in developing a highly skilled workforce within a safe and sustainable work environment.

We make the following submission in relation to the paper - Options to Reduce Emissions from Organic Waste. Our feedback relates specifically to section 5 of your feedback document. These questions relate to the regulations in the National Environmental Standard for Air Quality (NES-AQ).

General comments

Quarries typically operate fills that are classes 4 – 5 under the current landfill classification system. In general, material accepted at these sites is "cleanfill" or "hardfill" – generally inert material, managed through resource consents from regional and district councils. The definition of material that can be accepted at quarry sites varies, largely due to slightly different "cleanfill" definitions between the different regional/district plans, and Council expectations at time of granting consent.

There is typically an allowance for ancillary vegetative waste that cannot feasibly be removed from loads, such as grass in a load of topsoil from an earthworks project, or plant material which becomes mixed into earth and rock that has slipped onto a road. The consented limit is typically up to 5%, but at some older consented sites is up to 10%.

The Ministry for Cities, Environment, Regions and Transport's dashboard for waste sector emissions shows that the proportion of greenhouse gas emissions from "Uncategorised landfills" (classes 2 – 5) is very small compared to the overall emissions from the sector. We are therefore concerned that some of the changes proposed could have significant costs to address a very minor problem.

Responses to questions from consultation document

Question 5.1(b): Are changes needed to criterion 3 on requirements for landfills to manage landfill gas if they are currently open? Please explain the reasons for your answer.

This question does not recognise the difference in methane generation potential between the different classes of landfills. The definition of "landfill" under the NES-AQ would capture "cleanfill" sites that have been historically consented to accept up to 10% vegetative material.

If there was a requirement to retrofit landfill gas capture to these types of fill we consider the costs would significantly outweigh the benefits of greenhouse gases captured. An alternative could be to refine the definition of "landfill" in the NES-AQ so that it relates only to class 1 and 2 landfills.

Question 5.1(c): Are changes needed to criterion 4 on the maximum amount of putrescible or biodegradable material that is allowed in a landfill before regulations apply? Please explain the reasons for your answer.

there needs to be an allowance for ancillary inclusions of vegetative material in "cleanfill" or "managed fill" facilities.

Operators do not treat this as a ceiling or upper limit for accepting green waste. Instead, it allows for a level of pragmatism in the type of material that is taken to "cleanfill". For example, it is not feasible to separate vegetation from soil/rock when clearing a load of slip material from a road. The nominal level of 5% of a load has been stated to give a clear indication of what "ancillary" is. If there was no percentage allowed, we anticipate that this would be rigidly enforced by some regulators.

If class 3 – 5 fills were not allowed to accept this ancillary vegetative material, a significantly higher volume of material would need to be taken to a class 1 or 2 landfill. This would have the unintended consequences of filling up these facilities faster, and significantly increasing the costs of disposal from construction, maintenance, and disaster clean up.

Generally, material disposed of in quarry cleanfills is less than 2%, so a lower threshold could be viable. However, fills accepting solely slip material may have a higher percentage of vegetative material. Typically, these types of facilities are in remote locations (for example servicing the state highway network), so care would need to be taken that there were not unintended consequences for these types of fills.

Clear direction should be provided in this regulation review to support compliance and regulatory officials. Any reclassification considerations must provide certainty that concessions or similar arrangements will continue regardless of reclassification or disposal.

Question 5.1(f). What would the operational impacts be for you, your business or your council if any of the above criteria were amended? Please specify which amendments would have these impacts.

If the requirement to capture gas from "closed landfills" included class 3 – 5 fills there would be significant costs for monitoring and constructing landfill gas capture systems. These costs are not justified based on the level of greenhouse gases that could be emitted.

Removing the 5% allowance for vegetative material is likely to have significant additional costs for projects and development. This would be:

a) extra handling to try to separate vegetative material, which would increase the time / cost for projects. As described, this is unlikely to be feasible for material like slip material cleared from roads.

b) Extra costs for national and local roading authorities / projects from disposing of more material to a class 1 or 2 fill.

c) Unintended consequences of sending more material to class 1 or 2 fills, using up these facilities faster.

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