

To: New Zealand Infrastructure Commission – *Te Waihanga*

CC: Civil Contractors New Zealand

Subject: WasteMINZ feedback on the draft National Infrastructure Plan

Dear [REDACTED]

Thank you once more for the opportunity to provide feedback on the Draft National Infrastructure Plan (further referred to as the Plan). We appreciated the time the Commission took to engage with [WasteMINZ](#) directly and listen to our perspectives.

We see the Plan as a critical opportunity to shape long-term infrastructure outcomes and believe that the waste sector and waste management infrastructure can support emissions reductions, productivity gains, and regional job creation, which is currently not captured in this Plan. An effective and well-planned waste and resource recovery infrastructure network enables recovery of materials at their highest value, reduces methane and carbon emissions, builds local jobs and resilience, and can save our communities and government money through reduced costs.

We would like to provide the following feedback:

1. We strongly recommend that the Plan places greater emphasis on the critical role of waste and resource recovery infrastructure in supporting New Zealand's broader infrastructure system.
2. Waste infrastructure is critical to other forms of infrastructure. The costs of construction, civil works, and wastewater treatment balloon without access to well-sited, well-run resource recovery centres and fill sites.
3. Waste infrastructure is critical to communities. Until we learn how to eliminate waste at source, we need regular waste collections and a network of receiving facilities. Waste infrastructure is particularly critical in times of disaster when vast amounts of waste are unavoidably generated and must be cleared to allow first response, recovery and reconstruction.
4. Solid waste management is much larger than disposal facilities and landfills. As we move towards the future there is a need to adapt infrastructure to the changing needs of the New Zealand public and to address the reality of finite raw materials and resources. Currently New Zealand recycles less than 30% of household waste. To value resources, and grow our economy, this must increase which will require increased infrastructure investment¹.
5. Waste infrastructure is crucial for improving New Zealand's material productivity through resource recovery. Growing a resource recovery network is required, including community-based facilities and services that support product stewardship, repair, refurbishment and repurposing alongside larger scale sorting and recycling facilities. Within the construction sector, recovering and repurposing aggregate, soil, concrete, steel, and other materials will reduce demand on limited resources and thereby restrain

¹ Eunomia, 2025. [New Zealand's National Recycling Rate: Options and Estimates](#).

cost increases. Resource recovery plays a significant role in our achieving a circular and low-emissions economy².

6. The Plan should take a stronger stance on the need for coordinated national planning and investment of waste infrastructure. There is a need to align local government and businesses to ensure cross sector collaboration is taking place, to meet national infrastructure goals, so that the sector can respond to current and future challenges.
7. New Zealand needs better research and data to support our growing waste infrastructure needs. Recent data released from the Ministry for the Environment demonstrated that the scale of issues is larger than we know³.
8. The waste sector has a large problem dealing with nominally low-level contaminated soil and fill from the construction and other sectors. These soils make up 45 % of municipal waste, 78 % of construction waste, and virtually all controlled and managed fill⁴. This is putting severe pressure on infrastructure and fill space. Unlike other similar jurisdictions such as Australia and Canada, New Zealand has hardly any recovery capability for these soils nor remediation capability for highly contaminated material, which can make the worst wastes encountered during development very costly to deal with.
9. We strongly recommend that the Plan should separate solid waste from water to allow for a more targeted and nuanced infrastructure response. Grouping waste together with water risks downplaying the scale, complexity, and unique challenges of the waste sector.
10. There is a need to better connect infrastructure investment with policy drivers across different ministries, which can vary or change significantly over time. For example, the waste sector is being called on in New Zealand's Emission Reduction Plan to reduce landfill greenhouse gas emissions generated by organic wastes. Many organic wastes cannot easily be reduced at source because they are the result of our biological systems (such as sewage, green waste, or food scraps) or primary production activities. So, this means investment in new infrastructure and associated infrastructure. Without clear and stable policy settings, investment signals are weak and fragmented.
11. The Plan in its current form does not reflect the long investment horizons, land requirements, and regional variation involved in developing an effective waste infrastructure network and related services. There is minimal recognition of the interdependencies between waste and resource recovery infrastructure and with three-waters, roading and transport, and housing infrastructure. There are significant resource recovery and waste management issues generated across these sectors.

We would also like to provide the following feedback on section 7.3 (which we presented during the meeting):

- 7.3.1 Institutional structure: Waste infrastructure and services are not government-led in the same way as three waters and other public infrastructure is, with landfills and other waste facilities and services often commercially

² New Zealand Infrastructure Commission. “[Sector State of Play: Resource Recovery and Waste – Discussion Document](#)”

³ Ministry for the Environment, 2023. “[Improving household recycling and food scraps collections](#)”

⁴ BECA, 2025. “[New Zealand Construction and Demolition Waste Baseline & Tracking Methodology Report](#)”

- owned and operated. There are also significant regional differences and a stratified market structure that warrant stronger acknowledgement.
- 7.3.2 Paying for investment: Only the waste disposal levy is mentioned here, and other potential investment tools are not further acknowledged, such as revenue from user-pays charges ('polluter-pays'), funding through regulated or industry-led product stewardship schemes, private investment, alongside council rates.
- 7.3.3 Historical investment drivers: There is no mention of waste or resource recovery infrastructure despite clear shifts in waste policy and infrastructure development over recent decades.
- 7.3.7 Current investment intentions: This section lacks sufficient detail to understand where investment is occurring in the waste sector.
- 7.3.8 Key issues and opportunities: Pricing, governance, policy consistency, and coordination are all discussed in relation to water but not waste. Many of these themes, including access to funding, spatial and regional planning, and regulatory efficiency, are just as relevant to solid waste and resource recovery.

Conclusion

Overall, WasteMINZ is supportive of a nationwide infrastructure plan. The current issues with the waste sector exist because of poor planning and management of waste and resource recovery infrastructure. Waste sector planning needs to avoid similar mistakes, as well as managing the legacy issues from closed landfills.

At present, the Plan includes little substantive discussion of the significance of New Zealand's solid waste management, resource recovery (repair, reuse, recycling), and contaminated land management sectors. These sectors are critical to develop New Zealand's essential infrastructure, to support the well-being of our communities, and create "a productive and sustainable economy".

We would welcome the opportunity for further discussions with the Commission around the intricacies and unique features of waste management in New Zealand, which include funding and operations to further shape this important plan.

We would also point you towards a recently released NZIER report for WasteMINZ on the [Waste, resource recovery and contaminated land management sectors - Assessing the economic contributions of the sectors to New Zealand](#).