

C&D Waste: Crafting a Powerful Ecolabel; a call for input

Francesca Lipscombe (New Zealand Ecolabelling Trust) and Penny Kneebone (Tonkin + Taylor)

1 Why we are here

1.1 What is Environmental Choice?

Environmental Choice is New Zealand's official environmental label. It offers strong proof of environmental performance. The programme operates independently from the government but the label is government owned and endorsed. The programme's mission statement is to be the most trusted, recognised and used ecolabel in New Zealand. Its value proposition is to be robust, independent, scientific, transparent and verifiable.

Products and services that carry the label have been independently assessed and show ongoing compliance with our criteria. Our criteria are chosen using life cycle assessment to identify where the biggest environmental impacts sit, and where there is most potential for differentiation of good environmental performance in the New Zealand market. A product or service that uses the label must meet all the criteria, all the time.



1.2 Purpose of this presentation

There are 38 Environmental Choice specifications for products and services. We believe the time is right to develop a specification that recognises environmental high-performers in C&D waste services. We are here to seek your early input into what that specification might look like.

2 Who we are working with

2.1 BRANZ

Last year, you heard from BRANZ about their Resource Efficiency in the Building and Related Industries (REBRI) Certification pilot for C&D waste. This was a Christchurch-based trial, run by BRANZ with Christchurch City Council and True North Consulting. Criteria were developed around the REBRI Guidelines, and contractors and waste service providers were audited. The pilot was very promising. We're working closely with BRANZ to build on that good work in developing this specification.



2.2 New Zealand Green Building Council

This year, the New Zealand Green Building Council revised its Green Star tool, including the points available for C&D waste management. This provides a new driver in the market for 3rd party verification of C&D waste management claims. We're aware there may be other important drivers out there too, such as the Infrastructure Sustainability Council of Australia (ISCA) tool, which has been recently adopted by NZTA, and the new ISO 20400 Sustainable Procurement guidelines.



3 Overview of approach

Typically, Environmental Choice specifications are developed out of a direct market demand for a specification that differentiates good environmental performance. In the case of C&D Waste, the REBRI

Certification pilot and updates to the Green Star tool suggest there is an appetite for 3rd party verification in the C&D Waste area that could be met by an Environmental Choice specification.

Our overall approach is to build on the REBRI guidelines and REBRI Certification pilot to develop criteria that will meet the requirements of Green Star and, if possible, other needs for 3rd party verification of good practice. We want to develop a specification that provides confidence in good C&D waste management practice without stifling innovation. We are seeking broad feedback to help us arrive at the most powerful ecolabel possible for the New Zealand market.

4 What might the specification look like

At this early stage, we expect there will be separate sections for work sites, collection/transport, and processing. Each section might have core criteria plus add-ons for specific materials handled.

We propose that the criteria are focussed around outcomes and objectives (for example, maximising recovery of materials, minimising waste to landfill) with examples of the types of actions that could be done to meet those objectives, rather than setting specific directive actions. This has the benefit of providing flexibility in how the objectives can be met, encouraging good practice without stifling innovation, and would be consistent with the REBRI Guides. There would, however, need to be some measurable bottom lines to meet the needs of the Green Star rating tool.

We recognise that there will be common contractual requirements (e.g., outcomes, actions, reporting) and regulatory requirements that require a certain degree of data collection and reporting. We are particularly interested in understanding these existing mechanisms to ensure we do not unnecessarily introduce duplicate requirements.

5 Areas where criteria might be set

5.1 Environmental regulatory compliance

All Environmental Choice specifications require licence holders to demonstrate ongoing compliance with all environmental regulations. Different environmental regulations will apply to construction sites and collection services, and requirements vary regionally. We may seek to include criteria that require waste generators (for example, construction contractors) to demonstrate that they have received confirmation that the disposal sites they use comply with environmental regulations.

5.2 Good planning for waste management

The Green Star tool includes up to 3 points for C&D reuse or recycling. To get any points, the project must have a waste management plan and contract conditions requiring a certain percentage of C&D waste is reused or recycled.

The REBRI Certification pilot required construction companies to provide a waste management plan before works start, with justified recycling targets. The targets were not prescribed, but there was a stated expectation that the targets would improve long term.

We see good waste management planning as a way to encourage innovation, and it is potentially the biggest opportunity for good environmental performance.

Question: do you agree a waste management plan is essential for good environmental performance?

5.3 Measurable diversion from landfill

The Green Star tool requires re-use or recycling of more than 50% of C&D waste. Extra points are available for higher percentages (total of 1, 2, or 3 points for 50, 70, or 90%).

We are aware from initial consultation that measuring all waste streams collected may disadvantage small operators, who typically collect from multiple sites per truck run. We are also aware of the difficulties estimating diversion rates if weights of all materials are not recorded, due to variable levels of confidence in recordkeeping and conversion factors.

We are particularly interested in understanding alternatives to direct weighing/measuring as a means of demonstrating diversion from landfill.

Question: is measurement (by weight or volume) necessary to demonstrate diversion from landfill? What do you think would be a better way of providing assurance of this?

5.4 Details of services provided

The REBRI Certification included a number of quite specific requirements, for example, waste collectors required to provide separate bins for different waste types, and provide photos of these in use at sites. Some contractors noted that multiple bins created new safety risks on space-constrained sites, and an exemption was provided for small sites.

The REBRI Guidelines contain many specific ideas and examples for preferable services: for example, offer small-load collection service, provide covered bins for plasterboard, collect wood separately to allow separation of treated timber, collect metal from concrete with magnets and recycle, etc. We are aware that prescribed actions like this may not always provide the best environmental outcome in all situations, and may in fact stifle innovation. At this early stage, we expect criteria will be performance based, with a number of ideas/examples of how compliance with the criteria could be demonstrated, rather than providing a combination of specific requirements and exemptions.

However, we are also aware that there may be common practices that undermine good environmental practice which should be specifically banned.

Question: are there specific practices in the C&D Waste industry that should be specifically required? Or particularly poor practices that should be specifically banned?

5.5 Interface between contractor and collector

The REBRI Certification Pilot required construction companies to use only REBRI Certified collectors, and required collectors to provide weight-based records to all REBRI Certified construction companies. ECNZ licences are typically held by a single party, without reliance on another party also holding a licence. An ECNZ licence could potentially be seen as a straightforward and reliable way of providing confidence that subcontractors are complying with good C&D waste management practices.

Question: do you think a link/reliance between collectors and contractors is preferable? Is a link inevitable?

5.6 Staff and subcontractor awareness

The REBRI Guide required Certified Waste Collectors to provide information to construction companies on available waste management receptacles, signage, and collection frequencies, intended to minimise waste contamination.

Commitment at board and management level and staff engagement is likely to make or break the success of sustained good practice on site. The REBRI Certification required that construction contractors train all staff and subcontractors to separate waste into the appropriate bins. An alternative approach could be for contractors demonstrate how a broad awareness of good waste management is maintained, including the implications of contamination, and ongoing continuous improvement.

Question: what do you think is most effective way of promoting awareness of waste management?

5.7 Recordkeeping

The Green Star tool requires the contractor must measure each waste type from each site (weighed or volumes and conversion factors), keep records, and report regularly. The REBRI Certification pilot required regular reporting by waste collectors to construction companies, and required construction companies to publish (on websites) the recycling/reuse contractors they use.

Optional templated reporting for minimum information might have efficiency benefits, without the downside of introducing additional paperwork for no environmental gain for those companies that have existing mechanisms for regular reporting.

We are keen to avoid unnecessary reporting, and where possible, we prefer to tie in with existing reporting structures. Based on our experience with other ECNZ specifications, we will aim for a readily auditable set of criteria, with minimal routine reporting requirements.

Question: what recordkeeping do you think provides the biggest differentiation of environmental performance?

6 Market considerations

6.1 Opportunities for an ecolabel: who would value it?

We have identified several possible gaps in the New Zealand waste management market that an ecolabel for C&D waste services might fill:

- Claims verification in voluntary programmes, e.g. Green Star, ISCA.
- Project owners and architects specifying for NZGBC's Green Star and Home Star.
- Waste service providers who are seeking commercial differentiation.
- Waste generators who want confidence that their waste is being well-managed.
- Procurers and tender evaluators, where 3rd party verification is needed for claims of good C&D waste management practice.
- Territorial Authorities seeking verification to inform long term planning.

Question: Are there other gaps you can see in the New Zealand C&D waste market that we could look to address?

6.2 Potential barriers to ecolabel uptake

Our early consultation and feedback from the REBRI Certification trial identified some possible barriers we'll need to be aware of:

- Additional cost.
- C&D waste collectors not having the appropriate equipment to weigh or measure wastes.
- Reluctance to enter into additional paperwork.
- Ability to assess multiple sites, if the licence is for a service provider rather than an individual project.
- Ability to provide a label for contractors and collectors working in multiple regions of New Zealand, given the different types of C&D waste recycling and reuse infrastructure available.

Questions: Have you got any good ideas for how we can overcome these barriers? Are there other big barriers you're aware of that aren't on this list?

7 The feedback we're seeking

7.1 Who we're talking to

We're hoping to get feedback from as many interested parties as possible. This includes councils, construction and demolition contractors, development companies, government agencies procuring waste services, trade organisations, waste management companies, waste collection service providers, recyclers, development owners, and procurers of waste services.

7.2 The questions we're asking

We're interested in your thoughts on the following questions:

- How a label might be used
 - What appeals to you about the idea of an Environmental Choice label for C&D waste services?
 - Do you see a gap in the C&D Waste market that an ecolabel could fill?
 - Who do you think would see value in the label? What would the label need to deliver to be valuable?
 - Have you been asked to verify good practice, and what kind of proof have you provided?
 - If a label was awarded to a service provider, how often do you think we would need to check that the services still meet the requirements?
- Environmental impacts / differentiation
 - What do you think are the most important environmental impacts to set criteria about?
 - How do you think C&D waste service providers currently differentiate themselves?
 - What good practices do you think differentiate services?
 - What type of recordkeeping is already standard practice?
- Overcoming barriers
 - What barriers do you see for uptake?
 - Do you have any good ideas for how to overcome these?

7.3 Timeframes

Environmental Choice specifications are developed through a transparent process including a notified draft that is provided for comment, and all submissions are considered and addressed in developing a final specification. Provided we confirm there is a need for a specification, we plan to develop the specification by April 2018.

Before we even start work on a draft, we are running this early stage of consultation to frame up the questions the specification should answer: in particular, where and how can an ecolabel provide the most benefit. Please get your early feedback on this to us before the Christmas/new year break.

7.4 How to provide feedback

Please use the survey link on the Environmental Choice website: www.enviro-choice.org.nz, or drop us a line or call, whatever works best for you:

Francesca Lipscombe
 General Manager
 New Zealand Ecolabelling Trust
 09-845-3330
francesca@enviro-choice.org.nz

Penny Kneebone
 Principal Environmental Scientist
 Tonkin & Taylor
 09-359-2747
pkneebone@tonkintaylor.co.nz