



Seafood New Zealand

Submission to Ministry for the Environment

Transforming Recycling
20th May 2022

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1. Seafood New Zealand Limited welcomes the opportunity to submit on the Transforming Recycling plan.
 2. Seafood New Zealand is a professional organisation delivering industry-good services for the wider benefit of the seafood industry, an industry which had an annual export earnings of \$1.87 billion in 2021. Seafood New Zealand plays a leading role in developing and presenting the seafood industry's response on legislative and regulatory proposals affecting the industry.

Specific comments:

Proposal: Source separation of food waste is phased in for all businesses.

3. The standard operating procedure in the seafood industry is that; the industry would have already extracted all that can be extracted from the seafood, including rendering off-cuts for fertilizer use, before sending them to the landfill. Financially enforcing this food separation would place the wider seafood industry in a difficult situation due to increased operating costs.
4. We want to highlight that this requirement will come on the back of the ongoing Fisheries Amendment negotiations, which mandates that all fishes, including unwanted fish (referred to as bycatch) must be landed. As most bycatch have limited extractive value, they are normally sent to the landfill. Imposing further financial costs on the amount of food waste sent to landfills will be detrimental to the economic health of the industry.

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