# Draft Solid Waste Management & Minimisation Bylaw Summary of feedback

To support hearings 16 October 2024

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### **Summary of feedback received**

Public consultation on the Draft Solid Waste Bylaw was undertaken from Wednesday 28 August to Sunday 29 September 2024.

- A total of 58 submissions were received.
- 0 submitters indicated they wanted to be heard on the submission form.

The following acronyms are used in this document:

**FOGO** – stands for Food Organic & Garden Organic

**QR** – in the expression QR code, QR stands for Quick Response

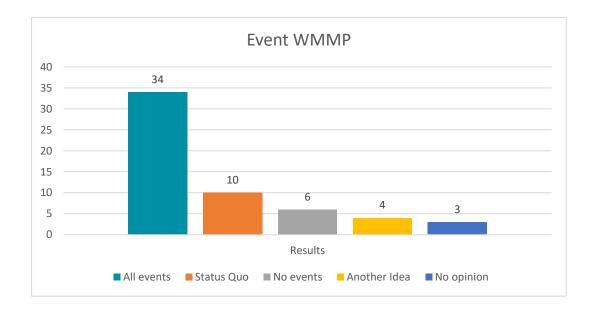
**VADE** - stands for Voluntary, Assisted, Directed and Enforced and it provides a measured and graduated approach to achieve resolution of non-compliance.

**WMMP** – stands for Waste Management & Minimisation Plan. In the context of this consultation it may be an Event WMMP which is a plan for managing and minimising waste from public events; OR a Construction Site WMMP which is a plan for managing and minimising waste from construction activity; OR it may be the Ashburton WMMP 2022 which is Council's current plan for managing and minimising waste from all forms of activity for the District as a whole. The latter plan is required under section 43 of the Waste Minimisation Act 2008.

# 1. Feedback on Event waste management and minimisation plans (WMMP)

Based on the question "Which is your preferred option for an event WMMP?"

| Options             | Submitters | Percentage |
|---------------------|------------|------------|
| All events          | 34         | 59.65%     |
| Status quo          | 10         | 17.54%     |
| No events           | 6          | 10.53%     |
| I have another idea | 4          | 7.02%      |
| I have no opinion   | 3          | 5.26%      |
| Total               | 57         | 100%       |



### 1.1 Submitter comments

| Submitter name     | Page  | Summary  | Staff comments  |
|--------------------|-------|--|---|
| Stephanie<br>Poole | 68    | <ul> <li>All events - Seeing how well received and utilized the Eco Educate rubbish diversion stations were at Glow in the Park demonstrates our communities want for recycling and organic waste diversion at public events.</li> <li>It was such a contrast to The Balloon show in Methven where, despite food vendors using compostable packaging and cutlery, everything went in landfill bins anyway meaning nothing was diverted. It was so disappointing.</li> <li>I think it's really important to, at the very least, have the same options we have at kerbside collection at all public</li> </ul> | <ul> <li>"All Events" was Council's preferred option for consultation and was the preferred option amongst submitters.</li> <li>Staff note and concur with the advantages noted by submitters.</li> <li>The proposal does not apply to privately organised events on land that is not owned or managed by Council, such as the Balloon Show Event at Methven. We have not consulted about extending the Bylaw to do so, and do not recommend this at this time.</li> <li>Council make Eco Educate available at no cost at all events</li> </ul> |
| Brenda Franz       | 67    | <ul> <li>All events – It is costly to clean up after a large event and if there is no accountability, humans by their definition, will take the easy way out. If there is no need to plan for a cleanup, someone else will be left to do it and no one will learn anything new.</li> </ul>   | on Council land if the type of event suits. This is on the basis that Eco Educate are in control of the event's waste management and can expect the help and support of the Event Organiser if required. In the past, Council has just supplied the bins and trailer but stopped doing this as we got back contaminated recycling at best.  |
| Shane              | 65-66 | <ul> <li>All events - Events should take the ownership of their events         As they need to be aware and sort what is needed to be done to enable some recycling rather than just all going to landfill     </li> <li>A great job currently done by Eco Educate and ADC on some of the larger events. Keep it up</li> </ul>   | <ul> <li>Council-organised events will sort waste into recyclables, glass, food organic and residual waste. We do not collect garden organic waste from Council-organised events.</li> <li>Officers are already working on simplifying the paperwork for WMMPs to make compliance as easy as possible for event organisers. We support this suggestion from submitters.</li> </ul>  |

| Submitter<br>name    | Page  | Summary   | Staff comments |
|----------------------|-------|---|----------------|
| Contributor<br>2131  | 53    | <ul> <li>All events - Ideally all events should have WMMP. Help will be required for event holders to be able to provide collection areas for the different waste and also the pick-up of the waste.</li> <li>The Council should be able to supply containers and collect all the segregated waste from all events and remove free of charge.</li> <li>Communicate with waste collectors like McCormick's to ask them to supply the appropriate bins and collection etc. This will make it a lot easier for groups and businesses to coordinate.</li> </ul> |                |
| Margaret<br>Anderson | 41-42 | All events – Feel this important in the management of waste. All events should be glass free, recyclable materials only to be used, and lots of signage of what goes into what. It can be done.   |                |
| David Folley         | 37    | All events – Remove the burden from rate payers for waste removal from events   |                |
| Deanne<br>Smeaton    | 32    | All events - But events (operators) are given templates they can work with so it doesn't cause too much more work/make it harder to hold events.  |                |
| Richard<br>George    | 11-12 | All events - There is a flow on effect - people are not that good at tidying up, so a waste management programme will leave the area tidier and ensure focussed areas of people consuming or purchasing goods can have a recovery to the right areas.   |                |
| Rose<br>Clearwater   | 10    | All events - Every event no matter what size should always have a waste management plan. It's a social responsibility and not a lot of extra effort to recycle rubbish properly   |                |

| Submitter<br>name   | Page  | Summary  | Staff comments   |
|---------------------|-------|--|--|
| Phil Walton         | 6-7   | All events – Yes, yes and yes, but cost will be passed on to the attendees of the event, that should not be the case but it will happen, to run any business, there are costs the business absorbs, the events people should follow suit, the cost of the waste management plan should come out of the events income before distribution to charities etc.                 |  |
| Julianne<br>Hornby  | 4     | All events - People don't think about who has to empty the public rubbish bins In our Council owned parks and reserves. Enough illegal dumping in these bins already. If organizers have to pick up and remove rubbish (not just leave in bags / boxes beside the bins for someone else to remove) they will monitor the area and leave it as they find it for other users |  |
| Contributor<br>2129 | 55-56 | Status Quo – While the status quo should be maintained, all event organisers should be encouraged to have WMMP with supplied information and education. This would remove impacting costs on small events but would encourage these events to consider waste minimisation that could have positive outcomes.   | <ul> <li>"Status quo" was not Council's preferred option for consultation and was not the preferred option amongst submitters.</li> <li>Our best available information on event size is that smaller events on Council-owned or managed land generally attract 150 attendees or more and our largest events can attract</li> </ul> |
| Contributor<br>2152 | 29    | • <b>Status quo</b> - No, this should be restricted to events with up to 50 people attending. All events mean that even an event of 5 - 20 people will draft a WMMP?   | <ul> <li>thousands of attendees¹.</li> <li>Officers support providing all event organisers with information and education to encourage them to "bin it right"</li> </ul>   |
| Contributor<br>2127 | 59    | <ul> <li>No events – You already have too many regulations.</li> <li>Most event organizers clean up now without you making more rules.</li> </ul>  | "No events" was not Council's preferred option for consultation and was not the preferred option amongst submitters.   |
| James Reid          | 57-58 | No events – Seems like more red tape making it harder for communities to hold events. Rather than creating more  | It is incorrect to state that all separated material ends up in landfill. 28% or 4.9 million tonnes of NZ's waste stream is  |

<sup>&</sup>lt;sup>1</sup> Hakatere Noodle Festival attendance was estimated at 6,000; 2024 Glow in the Park attendance estimated at 40,000 over the three nights.

| Submitter name     | Page  | Summary   | Staff comments  |
|--------------------|-------|---|---|
|                    |       | unnecessary paperwork, a better approach could be simply advising event holders that fines will be issued if waste is not removed after their event and the fines pay for contractors to clean up any mess.   | diverted from landfill. It is correct that too much recyclable material ends up in landfill as private sector specialists estimate that another 20% or 3.6 million tonnes could be easily diverted if disposed of correctly. <sup>2</sup> Our national reuse  |
| Taylor             | 35    | No events - It all ends up in rubbish anyway even when separated and sent overseas. Use it in a furnace to produce cheap heating and less pressure on electricity!  | <ul> <li>and recycling rates are poor, and we are one of the highest generators of waste per person in the OECD.<sup>3</sup></li> <li>Waste-to-energy plants are outside the scope of this Bylaw</li> </ul>   |
| Phillip<br>Everest | 15-16 | <ul> <li>No events - We are fast getting over regulated. All of these regulations hold a significant cost. Does the cost equal or is less than the gain? If we push costs too high, we run the risk of not having events.</li> <li>Surely think could be 'encouraged' through simple education programs.</li> </ul> | <ul> <li>review. They are used in many other countries and come with their own advantages and disadvantages.</li> <li>Education is a valuable tool in waste minimisation and staff support its continuing use. Requiring event organisers who wish to hold events on Council-owned land to have a plan for minimising and removing the waste generated by their event is a practical, low-cost regulatory requirement.</li> <li>Staff believe that issuing fines instead of requiring event organisers may do more to discourage events than the Council proposal. Our current practise in granting approval for events is to inform the event organiser that Council will invoice them for the costs of clean-up if the venue is left in an untidy state.</li> </ul> |
| Shane<br>Beauchamp | 34    | I have another idea - Council should provide a waste<br>management plan at all public places  | The notion that Council develops a "standard" waste minimisation plan that applies to all public places has some merit, but the challenge would be in reflecting both the diversity of the public spaces and the diversity of the events. There is also the possibility that in setting a "standard" Council takes away the freedom of operators to bring innovative solutions. Officers support the use of templates to make it easier to achieve compliance.  |

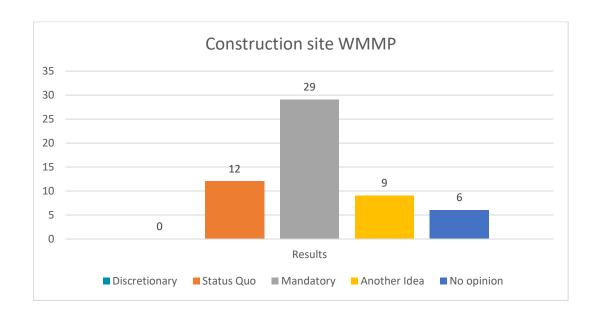
<sup>&</sup>lt;sup>2</sup> This information taken from <a href="www.reclaim.co.nz">www.reclaim.co.nz</a>, the website of NZ's largest privately owned processor of recyclable materials. See page link <a href="here">here</a>
<sup>3</sup> This information is from page 12 of <a href="mailto:rectangle-

| Submitter name                  | Page  | Summary  | Staff comments                                      |
|---------------------------------|-------|--|---|
| Kaaren<br>Rosser<br>(Enviro NZ) | 69-70 | No opinion stated - Managing waste at community events     Enviro NZ provide a service to maintain and empty bins on Council land. If all events require an event waste management and minimisation plan (WMMP), Enviro NZ welcomes event organisers to contact them and coordinate servicing the event and helping with their WMMP to ensure separation of waste streams. | Staff have no comments to offer on this submission. |

# 2. Feedback on Construction site waste management and minimisation plans (WMMP)

Based on the question "Which is your preferred option for a construction site WMMP?"

| Options  | Submitters | Percentage |
|--|------------|------------|
| <b>Discretionary</b> – Any building work over \$500,000 may be required to have a WMMP               | 0          | 0.00%      |
| <b>Status Quo</b> – Only non-residential building work over \$500,000 may be required to have a WMMP | 12         | 21.43%     |
| Mandatory – All building work over \$500,000 is required to have a WMMP                              | 29         | 51.79%     |
| I have another idea – (see comments below)   | 9          | 16.07%     |
| I have no opinion on this matter   | 6          | 10.71%     |
| Total  | 56         | 100.00%    |



### 2.1 Submitter comments:

| Submitter<br>name    | Page  | Summary  | Staff comments   |
|----------------------|-------|--|--|
| Margaret<br>Anderson | 41-42 | Status quo - Builders have to contend with so much already, with subbies, inspections, owners and architects' inputs. Perhaps the Council could provide waste bins for them, which are collected and then sorted somewhere. This could be done by those on parole, or community services through the court system. Not sure why you have selected \$500,000 as the build cost for have a WMMP in place.  | <ul> <li>"Status Quo" was not Council's preferred option for consultation and was not the preferred option amongst submitters.</li> <li>Council support for builders through the supply, collection and sorting of residual waste is effectively a transfer of costs from one industry to other industries and households. It raises issues of fairness and equity and shifts the burden from</li> </ul>   |
| Christine<br>Taylor  | 20    | <ul> <li>Status Quo - The majority of construction workers are doing a great job.         By enforcing this regulation for all building work over \$500,000 it is penalising those making an effort. The cost is then additional to already exorbitant consenting requirements that are then passed onto owners of the build.     </li> <li>Porta loos should be securely fastened to the ground and emptied regularly. The latter (emptied regularly) is difficult to monitor but should be documented if enforcement be required.</li> </ul> | <ul> <li>those who create the costs.</li> <li>Council's preferred option at consultation was the Option described as "Discretionary" – and defined as a change where Council can require a construction site WMMP to be prepared for any building project with a value of \$500,000 or higher. This option did not attract support from any submitter.</li> <li>Research of when this provision was first introduced into the Bylaw has shed no light on why the \$500,000 figure was first selected. Over the last three years, Council has processed an average of 606 residential consents each year; on average 106 of those were valued over \$500,000.<sup>4</sup></li> <li>Portaloos are outside the scope of the Bylaw, and outside the</li> </ul> |
| Brenda Franz         | 67    | Mandatory – Everyone is responsible, not just the good construction crew. If you can afford half a mill on a property, you can afford to clean up after yourself.  | <ul> <li>building consent process. This is a workplace safety matter.</li> <li>"Mandatory" was not Council's preferred option for consultation and was not the preferred option amongst submitters.</li> </ul>   |

<sup>&</sup>lt;sup>4</sup> This information is the correct data. The version printed in hard copies and the downloadable PDF was corrected on Council's website with these figures.

| Submitter<br>name   | Page  | Summary  | Staff comments   |
|---------------------|-------|--|--|
| Contributor<br>2129 | 55-56 | Mandatory – Without enforcement the burden of landfill costs fall on all ratepayers, rather than those that create the cost. This does not seem fair.  | Staff have concerns about the intervention logic supporting the WMMP proposal in this sector. In short, even if plans were provided there are a number of practical obstacles to   |
| Rose<br>Clearwater  | 10    | Mandatory - Definitely. Make sure the people who can afford buildings at that price point, actually take responsibility for their materials from start to finish.  | applying those plans, including site space, staff training and monitoring for multiple contractor and sub-contractor staff, storage of re-used materials, and finding third parties willing to take the re-used or recycled materials. There may be other actions Council could take that are lower cost and more helpful.   |
| Shane               | 65-66 | <ul> <li>I have another idea – Should be working with the Contractor of the Kerbside Collection and Recovery Parks who should be coming up with the ideas.</li> <li>It should be all worked to ensure all product is diverted from the Landfill. Hopefully this will happen in the future.</li> </ul>  | Council fully expects to work with its contractor to minimise waste. The Bylaw consultation has occurred at the same time as Council is tendering its waste management contract.  Waste contractors were invited to submit on the Bylaw and, with one exception, have chosen not to submit. That   |
| Contributor<br>2127 | 59    | I have another idea - Most builders and landowners are<br>already responsible in their waste management plans. No<br>need for more regulation  | submitter has been circumspect in their comments. Officers accept that the timing of the two processes is a barrier to waste contractors sharing their thoughts on waste reduction in a public consultation.   |
| James Reid          | 57-58 | • I have another idea – Again this seems like more red tape making construction less affordable and further restricting our district during times when many are struggling. Council should stay out of this process and let the builders manage waste in what way is best for them. The market will naturally punish any builders that are abusing their waste disposal processes. | <ul> <li>In regard to regulation and enforcement, officers support principle that regulation should be clear and cost-effective and officer authority to make choices under regulation means have clear parameters.</li> <li>In regard to building wrap, we understand that there are a few avenues for this material and all are probably at a higher cost than landfill. Some companies will take their</li> </ul> |
| Contributor<br>2137 | 46-47 | <ul> <li>I have another idea – Council needs to be clear on this and either enforce or not. Enforcing on "significant jobs" leaves it open to interpretation and misuse.</li> <li>If enforced only on significant jobs it adds yet another layer of cost to larger contracting firms who already have to cover</li> </ul>  | <ul> <li>material back which seems the best option as they will have the contacts for recycling options.</li> <li>In regard to incentives and penalties, Council has received submissions calling for more use of both. Staff believe that Council should consider all options available to support</li> </ul>   |

| Submitter<br>name   | Page  | Summary  | Staff comments   |
|---------------------|-------|--|--|
|                     |       | <ul> <li>many regulatory requirements that smaller firms tend to miss. This creates further gulf in overall project costs when comparing those companies who do, and those other companies who don't follow such regulations.</li> <li>In effect you send a message that people and companies can be treated differently (and potentially at one given person's discretion - which is very unwise for a council).</li> </ul> | <ul> <li>behaviour change.</li> <li>In regard to consent value thresholds for requiring a WMMP, research of previous advice to Council reveals there is no clear rationale expressed for the current threshold of \$500,000. Reviewing the bylaws of the Councils in the Canterbury region staff found that:</li> <li>Four councils have no solid waste bylaw</li> </ul> |
| David Folley        | 37    | I have another idea – I believe that all building work should have a waste management plan, too much is going to landfill that could be recycled.  | <ul> <li>Three Councils with waste bylaws have no provisions for<br/>construction WMMPs</li> <li>Three councils with waste bylaws (including Ashburton)</li> </ul>   |
| Peter Murray        | 36    | I have another idea - All building work that requires a permit is required to have a WMMP. The Council could have WMMP templates available for quick and easy compliance.  | <ul> <li>have provisions for construction WMMPs; and</li> <li>All three with waste bylaws (including Ashburton) take a discretionary approach</li> <li>Only Christchurch includes residential buildings within it</li> </ul>   |
| Contributor<br>2152 | 29    | I have another idea - Mandatory for all building work over \$250,000 is required to have a WMMP.  Residential Building projects over 500,000 means that only 18% of residential projects will have a WMMP (using your current data). This is too low considering that most projects in Ashburton are below \$500,000 in value.   | <ul> <li>discretionary approach; and</li> <li>Only Ashburton specifies a financial threshold</li> </ul>  |
| Phillip<br>Everest  | 15-16 | I have another idea - Too much regulation and cost. We don't (need) more regulation. Again, education should be the tool not regulation. What is the waste management and minimization policy on 'glad wrapping' building during renovation which presumably reduces dust, noise, site health and safety, reduces weather dependence for builders - but has an environmental cost?   |  |

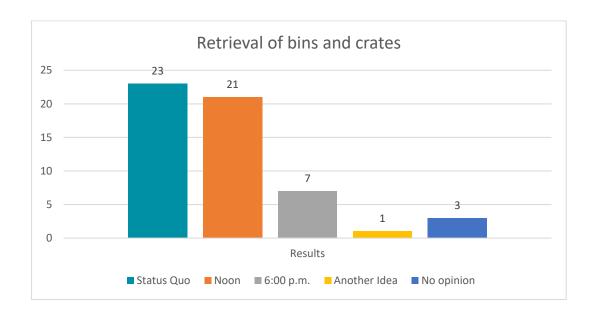
| Submitter<br>name               | Page  | Summary  | Staff comments   |
|---------------------------------|-------|--|--|
| Richard<br>George               | 11-12 | I have another idea - With current building costs, I think 500k is too low for the margin - it should be 800k. The cost of waste will not change too much, but the percentage will be smaller. The current cost of housing would preclude any rises in construction cost. That said construction is the biggest waste in NZ and we should encourage reduction. A WMMP has the word minimisation in it which is not a definite line, just a recommendation. If we don't go with levels, then there will be too many holes. I think a carrot rather than a stick - reduction in inspection fees, the permission to advertise as a waste minimisation site etc. |  |
| Phil Walton                     | 6-7   | <ul> <li>No opinion stated - In an ideal world the waste from building work should be the on the supplier to collect and sort in a sustainable solution to either re-use the scrap in some form and manner, without the supplier passing on this cost to building firms and the public in general.</li> <li>This would also help the dog chasing its tail in regard to the NZ mentality of pass the cost on to the end user, e.g. inflation, and or through Reserve Bank credit, interest free fund to support the cost of such disposal by the suppliers, But the supplier bears the cost.</li> </ul>   | <ul> <li>It is not clear to staff who submitter Walton is referring to when he talks about the 'supplier'. Some companies have systems in place to retrieve packaging waste and unused products such as pink batts. These initiatives are generally voluntary.</li> <li>In a free market economy, it is normal for businesses to recover their costs and generate profits, by passing the costs of production onto the people who purchase their goods and services. Where businesses absorb the costs, this is part of their value proposition to their customers.</li> </ul> |
| Kaaren<br>Rosser<br>(Enviro NZ) | 69-70 | No opinion stated - Construction Site Waste Management and Minimisation Plans – To ensure the effectiveness of construction site waste management and minimisation plans (CSWMMP) the waste streams separated during construction must have viable options for aggregation, and re-use. Some re-use options require transportation to Christchurch or Timaru which may reduce the economic viability of their diversion from landfill. Therefore, any residential CSWMMP should not be mandatory until the   | Staff note the observations made by Enviro NZ.   |

| Submitter name | Page | Summary   | Staff comments |
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|                |      | majority of waste streams can be effectively dealt with in the Ashburton district. Enviro NZ welcomes discussion with the relevant personnel at Council to discuss diversion options for construction material. |                |

### 3. Feedback on retrieval of bins and crates in the central business district

Based on the question "What is your preferred option for the retrieval of bins and crates in the Central Business District?"

| Options  | Submitters | Percentage |
|--|------------|------------|
| Status Quo – CBD business bins are retrieved on collection day after kerbside collection             | 23         | 41.82%     |
| <b>Noon</b> – CBD business bins are retrieved by 12 noon on collection day after kerbside collection | 21         | 38.18%     |
| 6 pm – CBD business bins are retrieved by 6 pm on collection day after kerbside collection           | 7          | 12.73%     |
| I have another idea – (see comments below)   | 1          | 1.82%      |
| I have no opinion on this matter   | 3          | 5.45%      |
| Total  | 55         | 100.00%    |



### 3.1 Submitter comments

| Submitter name       | Page  | Summary  | Staff comments   |
|----------------------|-------|--|--|
| James Reid           | 57-58 | Status quo - Businesses are busy and may run out of time or simply forget to retrieve their bins on occasion. Rather than face penalties maybe an education approach is best and fines are only issued if a single business has been spoken to many times first.             | <ul> <li>"Status Quo" was Council's preferred option for consultation and was the preferred option amongst submitters.</li> <li>Staff note that the issue of unretrieved bins is more common on the one-way sections of Burnett Street and</li> </ul>  |
| Margaret<br>Anderson | 41-42 | Status quo - What is a convenient time for businesses? They need to ensure this task is assigned to a specific person before they leave the premises. But on windy days it may have to be collected earlier. Times may vary due to variances of rubbish truck pick up times. | Tancred Street. In these areas, businesses must put their bins on one side of the road for collection, which means that business owners on the "collection side" of the street have more bins than usual and businesses on the "no collection" side of the street are not prompted by a bin in front of their business to bring it inside. |
| Phillip<br>Everest   | 15-16 | Status quo - CBD owners seem to remove them as soon as they are at work. More regulation giving the Council teeth to charge but what is it achieving?  | <ul> <li>Staff see some value in sharing the results of consultation with CBD businesses and some ongoing education.</li> <li>There remains scope within the Bylaw to deal with emptied bins left out beyond collection day.</li> <li>Education, as part of a VADE approach, is a good place to start.</li> </ul>                          |
| Brenda Franz         | 67    | Noon retrieval – There are more places for folk to sit and eat in the CBD outside of establishments and no one likes to do so around bins. As well, it is a deterrent for using them by the public or worse, kicking them to the kerb.                                       | "Noon retrieval" was not Council's preferred option for consultation and nor was it the preferred option amongst submitters. At 38.18% it was a close second preference to Status Quo  |
| Shane                | 65-66 | Noon retrieval – Should be gone as if they are emptied early in<br>the morning (where I believe collection starts at 7am) the  | CBD collection time is specified under the solid waste contract is 7am. This will be corrected in the Bylaw.   |

| Submitter name      | Page  | Summary  | Staff comments  |
|---------------------|-------|--|---|
|                     |       | <ul> <li>business should be able to have them removed when starting to open their business for the day. Shouldn't be an excuse</li> <li>Possibly an issue on Public Holidays if they had been out the day before</li> </ul>  | Where CBD collection day is followed by a public holiday, a sensible regulator would clarify expectations and exercise reasonable discretion. Our expectation/practice is that if it is a public holiday, and limited                           |
| Contributor<br>2129 | 55-56 | Noon retrieval - Providing that bins and crates are emptied before business hours commence, businesses should remove these before noon.  | businesses are open with few people around, we see no need to enforce this aspect of the Bylaw and bins would come in the next day by the required time.  |
| Simon<br>Atkinson   | 30-31 | • Noon retrieval - I am from Christchurch and my idea is bring in the bins by midday. Any businesses that have NOT managed to get them in by midday (Because they do not come in till after midday). Look at this idea of mine. My idea is that the neighbouring businesses who come in before 12pm can help them out for love and goodwill by bringing in their bins to the areas they have been instructed to do that. It does not take so much effect to do that. When those employers and employees from those affected businesses arrive to their workplace. They say thanks to those people who help them out and grab any keys if need be. That idea of mine I am sure would work very well and very easy to do and we all do our bit as a community of helping out each other. |   |
| Richard<br>George   | 11-12 | 6pm retrieval - People are people and I reckon pulling your bin back in is way down the list. 6 pm should give plenty of time. But why not personal bins in the CBD? Why not litter? Why not anything that makes the CBD look untidy. Bins are a part of life.   | "6pm retrieval" was not Council's preferred option for consultation and nor was it the preferred option amongst submitters.   |
| Phil Walton         | 6-7   | I have another idea - CBD's in our larger centres already struggle with enough flexibility within council parking by-laws to have parking space turn over for foot traffic renewal for shopping, without rubbish and recycling trucks placing  | <ul> <li>This response option gives submitters an opportunity to bring fresh ideas to the consultation.</li> <li>Business owners in the CBD group email list were invited to give their input during the first week of consultation.</li> </ul> |

| Submitter<br>name | Page | Summary   | Staff comments |
|-------------------|------|---|----------------|
|                   |      | themselves to make parking matters worse, the smaller centre's not so bad for congestion.   |                |
|                   |      | <ul> <li>My take on this is to go back to the business owners and give<br/>them the opportunity to either agree we will sort our own<br/>rubbish on a as we need to dump basis, less of large type<br/>vehicles within CBD's collecting, has to be good in many ways,<br/>and leave it to the business concerned. Smaller towns etc, the<br/>placement of bins waiting for a truck to collect is probably not<br/>such a problem, time wise in these CBD's Sunday's.</li> </ul> |                |

# 4. Other changes to the bylaw

Based on the question: "Council has made other changes to the Bylaw which you are welcome to comment on. These are listed on page 9 of the Consultation Document. What are your thoughts?"

| Submitter name      | Page  | Summary  | Staff comments  |
|---------------------|-------|--|---|
| Kate White          | 64    | • 8.7.5.4 Remove the rule and increase public education, e.g. sign on the bin 'Is this bin full? Let us know!' Showing how.  | FOGO collection conditions of service   |
| Contributor<br>2129 | 55-56 | On the food scraps collection, I would have concern that bins can be left out for most of the day. Residents have to put them out before 7:30 a.m. but they may not be collected until late afternoon. It would be a good idea to prioritise early collection of these bins. | <ul> <li>Council is tendering this service as part of its next waste<br/>management contract. Final details of the collection may<br/>vary from the draft Bylaw after discussions with, and input<br/>from, the preferred tenderer. Points made by submitters<br/>will be considered. Given the cost of trucks, it is unlikely to<br/>be financially realistic for the service to prioritise every bin</li> </ul> |
| Murray<br>Gardiner  | 50    | Rollover the existing Bylaw – make no changes  | for early collection.   |

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| Peter<br>Murray     | 36    | <ul> <li>Keep bylaw rule <u>8.7.5.4</u> and promote the use of "Snap, Send,<br/>Solve" on all Council litter bins with "Snap, Send, Solve"<br/>information and QR Code.</li> </ul>   | Early collection requests may be prompted by concerns about odour. Staff note that food organics are already deposited in red bins but odour complaints are rare.   |
| Wahine<br>Maori     | 25    | <ul> <li>Stop stealing ratepayers' bins please. We pay for the bins and<br/>stealing them is theft. What's the difference between plastic and<br/>plastic?</li> </ul>  | <ul> <li>Three strikes rule</li> <li>The cost to the community from contaminated loads can be very high, so bin audit and the three strikes rule are both necessary and cost effective. Staff estimate the</li> </ul>   |
| Contributor<br>2165 | 17    | Get rid of those eco educate clowns that check our bins seeing as you're landfilling the yellow bin anyway. We've had our yellow bin rejected for pathetic things and now everything goes in the red.  | <ul> <li>number of bins removed for 90 days is around or &lt; 1% of all bins</li> <li>Staff believe the bylaw requires clarification because, within the 1% are people who treat the entire yellow</li> </ul>   |
| Phillip<br>Everest  | 15-16 | Agree with the 3 strikes rule - need to have some teeth to ensure persistent offenders are dealt with for the benefit of all.  | recycling bin as if it were a red bin and make no effort to separate recyclables from residual waste. This form of  |
| Richard<br>George   | 11-12 | The main points make sense. The one up for discussion on placing litter in full or wind compromised bins is a bit strange. Not sure why one option is to leave the education as it is. I doubt very many people (myself included) are even aware of this. Around town and suburbs you see optimists that reckon a stack of litter 300 mm above the bin is fine. Also, if you have litter, very few people hold on to it until the next receptacle. They will either squash it in or simply dump it. People are the weakest link. Perhaps doubling the bins in key areas off the same pole? You are thinking about red bins in the Ashburton CBD, what makes the ugly overflowing bins any more pleasant? | <ul> <li>blatant non-compliance can – and does – result in immediate removal of the bin on the "first strike".</li> <li>Service levels</li> <li>Council provides a kerbside collection service to over 11,500 households and businesses. There are around 14,400 households in the district, and after subtracting businesses most households still receive a kerbside collection service. In rural areas, there is less demand for a kerbside collection service and rural kerbside collection would be much less cost-effective.</li> <li>There are resource recovery parks at Ashburton and</li> </ul> |
| Rose<br>Clearwater  | 10    | How many times has the Bylaw Clause 8.7.5.4 actually been applied to people? I think you may as well keep the law in place but also increase public education. I think Bin it Right was a great push to Mid Canterbury, keep going and showing the public that Ashburton District cares about rubbish and waste  | Rakaia, a Methven green-waste and inorganic material<br>drop-off facility, and rural recycling drop-off facilities at<br>Carew Peel Forest, Fairton, Hakatere huts, Hinds,<br>Lauriston, Mayfield, Mt Somers, Pendarves, Rangitata<br>huts, South Rakaia huts, Staveley & Willowby. Rural   |

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|                 |      | and we are proud to present a clean town to the thousands of people who pass through every day.   | households can take their recyclables to any of those locations.  |
| Phil Walton     | 6-7  | • Yes yes and yes, long term reduction in greenhouse gasses and emissions, I think you would be surprised to how the average bloke, family, are right up with this. People making money and big money at that, have a different perception and to a degree have to pay staff etc. To be honest when we first arrived in the area we came into Council, talked to the lady behind the counter about rubbish and what are the services, we told her we were 14 odd km's out of town in a rural district. Wait for it, the lady says, "HAVE YOU GOT A PIT FOR YOUR RUBBISH?", I tell you what that was 4 years ago and it almost knocked me over, it's 2021 then and the Council is suggesting bury your rubbish. Now come on, this is the sort of thinking that has to change BIG TIME, along with the water table already a poor quality for reasons we all know and Council does. NO, sorry it starts at the top, central government then local, the thinking has to change, the long term effects that authorities make choices on and or have the ability to change with clear change of thinking coming from central government to bring about changes to pre-historic thinking that it's okay to bury your rubbish and burn plastic NO. | <ul> <li>We accept polystyrene at Resource Recovery Parks free for residential and at a cost for commercial.</li> <li>More detail on the range of materials that can be recycled and re-used by drop-off at Council facilities, and the charges or conditions that apply, is contained in the draft Bylaw.</li> </ul> |
| Matt Reveley    | 3    | If the council are tightening up on our waste management, then I believe they need to supply more types of recycling than they do at the moment. Like polystyrene and plastic wraps and similar to name a couple. I know these can be recycled in other areas of the country so why can't we do it here. Currently that all goes into landfill and I believe that is appalling considering that the council should be leading the way on recycling as much as possible.   |   |
| Mary<br>Schmack | 2    | I like the FOGO Bin - in September '26.   |   |

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| Kaaren<br>Rosser<br>(Enviro NZ) | 69-70 | Proposed Bylaw Wording – Enviro NZ considers the proposed track changes to the wording of the bylaw to be acceptable. |                |

## **5. Other comments**

Do you have any other comments you'd like to add?

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| Kate White        | 64    | Waste minimization is so important! I applaud the work done<br>by the friendly team (Eco Educate) at all major Council run<br>public events. Great that ADC supports this and the waste<br>minimization workshops they run too. A great resource for<br>the community.  | Waste-to-energy technologies are widely used in other countries, especially where there are higher population densities. Council disposes of its residual waste to Kate Valley landfill, which is a comprehensively engineered modern landfill facility that operates to the highest  |
|                   |       | You guys need to put some serious thought into reducing spending and debt. I see many people in the community struggling to make ends meet and are facing increased costs everywhere.   | <ul> <li>international standards, fully compliant with New Zealand landfill guidelines and the US Environmental Protection Agency and European Union standards for municipal waste landfills. Council is also a shareholder in that facility.</li> <li>Kate Valley landfill is primarily a landfill, but it also</li> </ul>                                     |
| James Reid        | 57-58 | <ul> <li>Meanwhile ADC has been overspending in so many areas,<br/>most notably your new building. It seems consultants are<br/>over-speccing every project that council undertakes, creating<br/>more profits for themselves, overspending on construction,<br/>having assets that were never required and ultimately<br/>increasing debt and rates. ADC could have easily built a much<br/>cheaper, fit for purpose building that served our community</li> </ul> | generates electricity from the biogenic methane created in the landfill steadily over time. At present, it generates enough electricity to power 2,000 homes. At the same time, it still retains the carbon content of any plastics in the waste stream within the landfill, unlike incineration. Officers understand that Kate Valley will continue to capture |

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|                     |       | <ul> <li>just as well without the huge cost and large expected ongoing maintenance costs.</li> <li>I propose that someone with a construction background is employed with the sole purpose of keeping projects simple and cost effective. Filtering proposals from consultants to remove unnecessary components, ensuring that projects are actually going to be well utilised and that local contractors are used!</li> </ul> | <ul> <li>biogenic methane for energy generation well after the landfill is at capacity.</li> <li>The facility is consented for 35 years until 2039. It would seem unlikely that Council would choose to explore waste-to-energy alternatives until the design life of Kate Valley Landfill was nearing an end<sup>5</sup>. As the Kate Valley partnership owns 2,500 Ha of land (of which the landfill occupies 37 Ha), one of the future options is to piggyback off the existing</li> </ul> |
| David Folley        | 37    | <ul> <li>We need to look at other ways of recycling timber, currently too much is going to landfill.</li> <li>Maybe some form of high-efficiency burner that is linked to power generation to dispose of wood products.</li> </ul>   | <ul> <li>infrastructure and seek consent for another site at Kate Valley. <sup>6</sup></li> <li>Council expects it would explore all reasonable and practicable residual waste disposal options including their economic, financial and environmental sustainability in the</li> </ul>  |
| Taylor              | 35    | <ul> <li>Rural bins need to be unlocked so people can actually open<br/>them to put items in</li> </ul>  | light of the waste management technologies and standards applying at the time.  |
| Simon<br>Atkinson   | 30-31 | Perhaps information in easy read plain language     (www.peoplefirst.org.nz for more info)   | The lids at rural transfer station bins are locked open for various reasons. Open lids lead to litter on windy days and      was transfer to an exact days. Limiting how for the lide and are limiting to the lide and are limiting to the lide and are lines.  |
| Contributor<br>2163 | 19    | Can the pickup trucks in residential areas come about the same time each week? We've had red bins collected any time between 8.30 and 6pm.   | wet materials on wet days. Limiting how far the lids open prevents dumping of large items like appliances or large bags of waste. Large bags of recyclables cannot be deposited either as the material must be loose for sorting.   |
| Phillip<br>Everest  | 15-16 | <ul> <li>Rather than taking vast amounts of rubbish to land fill, should we take the lead from many 'Green' countries in Europe who burn their waste using the heat for home heating or electricity generation.</li> <li>This appears a way more environmentally approach than we do currently just burying in the ground and recycling a bit. Is</li> </ul>   | <ul> <li>Unflattened cardboard takes up room in the bins and is hard to sort at facilities.</li> <li>Staff appreciate the feedback on providing information in easy read plain language and the information on resources available through People First NZ. We are always seeking to improve and to make the best use of the resources available</li> </ul>   |

<sup>&</sup>lt;sup>5</sup> Design life is on-course for 2039. Original consenting process took ten years from concept to approval. Joint venture would decide whether and when to seek consent for future landfill cells – perhaps 5-10 years out from end of design life?

<sup>&</sup>lt;sup>6</sup> Staff acknowledge the advice and assistance of Ajay Krishna, Environmental Engineer, with information on Kate Valley Landfill.

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|                     |       | the material we pull out for recycling actually recycled? What proportion is too difficult and expensive to recycle and is buried?   | <ul> <li>Staff comments on the volume of recycling actually recycled can be found on pages 8-9.</li> <li>Staff note that there have been issues earlier this year with the regularity of timing of collection. This was due to the loss of a large truck which was replaced by two smaller trucks, necessitating new staff. Smaller vehicles and new drivers impacted the timing of collection. Council and its contractors strive to ensure a consistent service and the issues experienced earlier this year have largely been resolved.</li> <li>Officers have not responded to comments that are outside the scope of the consultation,</li> </ul> |
| Contributor<br>2167 | 14    | <ul> <li>Give households green waste bins instead. We need green waste (service)</li> <li>Fix the roads in Rakaia.</li> </ul>  |  |
| Richard<br>George   | 11-12 | The last survey there was at least one option that the public chose, but the council did not follow up on. Either the people speak and you suck it up, or stop asking.   |  |
| Phil Walton         | 6-7   | Our local mayor passed the comment there's no frills regarding spending. Ah NO, sorry that's not the case. Prioritise your spending please, focused on need to spend not want to spend. e.g., the subject is minimise rubbish and waste, was the new Council Building and Library really necessary? I think not. The Council entered into a contract to create more waste and rubbish by building the building. Refurbish the old building; you have entered the throw away mentality. New vehicles, not necessary, more waste. Council needs to re-think your priorities. |  |
| Mary<br>Schmack     | 2     | Keep up the good work Councillors!   |  |