

Submission



Te kawe i te haepapa para: Taking responsibility for our waste

PREPARED BY: Ashburton District Council
PO Box 94
ASHBURTON 7774

SUBMITTED TO: Ministry for the Environment
via email wastelegislation@mfe.govt.nz

Contact: Operations Manager
hernando.marilla@adc.govt.nz

Introduction

1. Ashburton District Council (Council) welcomes the opportunity to submit on the Ministry for the Environment's *Te kawa i te haepapa para: Taking responsibility for our waste*. This submission has been made by Management level at Council.
2. Located an hour's drive south of Christchurch, more than 35,400¹ residents live in our district. Approximately 50% of our residents live in the main town of Ashburton, with the rest of our residents living rurally or in smaller towns or villages across the district.
3. Ashburton District experienced moderate and sustained population increase since the mid-1990s, increasing by 23% between 2006 and 2013 (a 3.3% increase per year). This growth, however, has now slowed, with an average growth of 1.3% per year since 2013.
4. Our role in our district's waste management involves providing collection services and facilities for transferring and transporting waste to landfill disposal or to other processing facilities. Our kerbside bin collection service covers 73% of households across our district.
5. We also have two resource recovery parks (in Ashburton and Rakaia), a green waste and inorganic material drop-off facility (in Methven) and a number of rural recycling drop-offs around the district.
6. All of our landfill is trucked to the Kate Valley Landfill – the most comprehensively engineered waste management facility in the South Island. The landfill has a leachate management system which collects and stores leachate ready for treatment, a gas management system that collects methane produced by the landfill and pumps it to generators that produce electricity, and a surface water management system which collects stormwater and ensures only clean water flows to the wetlands.

General comments

7. Council supports the submissions prepared by Taituarā and the Canterbury Mayoral Forum.
8. In addition, we would like to highlight some specific areas of particular concern to our district.

¹ Statistics New Zealand Population Estimates 30 June 2020

Responses to questions in the consultation document

Q1. Do you think changes are needed in how Aotearoa New Zealand manages its waste?

9. Yes, we agree that change is necessary. Council believes that without changes in regulation, the decision to adopt circularity will be purely driven by economic interest.

Q2. Do you support tackling our waste problems by moving towards a circular economy?

10. Council is supportive of moving towards a circular economy. In addition to decreasing the amount of waste, this system would also lead to a sustainable system – the final goal of the circular economy concept.

Q4. Do you support the six core principles or would you make changes?

11. Council supports the six core principles proposed in the new waste strategy for Aotearoa New Zealand. However, Council feels the core principals are weighted towards tackling issues at the bottom of the hierarchy, and missing opportunities to tackle issues further along the supply chain. Council encourages further consideration of the issues at the top of the supply chain.

Q5. Do you support the proposed approach of three broad stages between now and 2050, and the suggested timing and priorities for what to focus on at each stage?

12. Council suggests increased analysis to determine economic, social, cultural and environmental outcomes, in particular how this applies to pastoral agriculture as it is not well documented at present.

Q7. What else should we be doing in stage one?

13. Our district consists predominantly of agri-food industries - we are a supplier and producer economy. Council feels that the focus of the proposed stage one actions are focussed on past farm-gate issues and less on, on-farm processes. We encourage further consideration of this.
14. We also suggest an increased focus on curbing and converting the agri-food waste into new materials or products. This will help to instil the principles of reuse and repair. Recycling could also help local economies by generating a new profit stream and, in the long term, by reducing environmental damage.
15. There are a number of gaps in our knowledge, which require further research. This would improve the success of implementing circularity in Aotearoa New Zealand.
16. We also suggest making reporting of waste generation mandatory.

Q8. What are the barriers or roadblocks to achieving the stage one actions, and how can we address them?

17. The supply chain in the agri-food industry has several unique characteristics that make it different from other industries. A significant amount of information is unknown to us at this stage - more research is required to understand the complexities.

Q9. Do the strategic targets listed in Table 1 focus on the right areas?

18. Council suggests an increased focus on the societal and behavioural aspects of implementing a circular economy will be important to ensure strategic targets are achieved. This will require identification of the actors and consideration of the linkages between stakeholders in the system.
19. We would also like to note there is no strong regulatory requirement for reporting of waste by businesses. In addition, it should be noted that the burden of changing production and manufacturing processes will likely be passed on to the consumers.

Q11. Do you think new legislation should require the government to have a waste strategy and periodically update it?

20. Council agrees with the proposal that new legislation should require government to have a waste strategy that is periodically updated.

Q12. How often should a strategy be reviewed?

21. Council suggests the waste strategy should have a 10-30 year outlook in line with other infrastructure planning horizons. The review period should align with councils' 3 years planning processes.

Q13. How strongly should the strategy (and supporting action and investment plans) influence local authority plans and actions?

22. Council suggests the national strategy should be reflected in local authority's long-term plans.

Q14. What public reporting on waste by central and local government would you like to see?

23. It would be necessary that the central government is able to accurately provide data about the actors in the agri-food industry. From upstream of the supply chain (suppliers and processors) through to the distribution actors, such as traders, processors and retailers which are involved in all parts of the supply chain.
24. We suggest that local government should gather and report accurate information about the industries that handle the food market in their respective jurisdictions. They are connected in the downstream supply chain to the consumers, who consume the product and generate local household waste.

Q21. Do you support strengthening obligations around litter by creating an individual 'duty of care' to dispose of waste appropriately?

25. An alternative to this proposal, is emphasizing that waste can be provided to other industries to be utilised – completing the circular economy.

Q23. Do you support a nationwide licensing regime for the waste sector

26. Yes, Council supports a nationwide licensing for waste.
27. Licensing is best managed at a national rather than local level. Most waste operators would prefer one central licensing scheme where only one license is required – rather than having to register under multiple schemes managed at a local level. Licensing is also the best way to achieve better data on waste volumes and waste flows from the private sector.

Q24. Should the new legislation include a power to require a tracing system to be developed for some or all types of waste?

28. Yes, Council supports the development of a tracing system. The success of a circular economy is dependent on the generation of accurate information on what waste is generated, and how this will be reused, remanufactured or recycled.

Q25. What aspects of the proposals for regulating the waste sector could be extended to apply

29. We would encourage mandatory reporting by large manufacturing and construction companies of waste generation and disposal.

Q26. Should the new legislation keep an option for accreditation of voluntary product stewardship schemes?

30. Council suggests a mandatory scheme will be required to ensure compliance.

Q35. What factors should be considered when setting levy rates?

31. Council suggests that education and information campaigns should be considered when setting levy rates. In addition, waste audits and monitoring, and incentive schemes should also be considered.

Q40. Which elements of compliance, monitoring and enforcement should be the responsibility of which parts of government (central government, regional councils, territorial authorities) under new waste legislation?

32. The creation and funding of an Enforcement Officer in the territorial authority should be funded through the Waste Levy.

Q42. What expanded investigation powers, offences and penalties should be included in new waste legislation?

33. A significant volume of waste is generated by large manufacturing companies which is not monitored or reported. In addition, a significant volume of construction and demolition waste is being generated and not accounted for. Council believes that territorial authorities should be given the power to regulate waste from these sources.
34. With respect to 'Data collection powers' on page 63 of the consultation document. We suggest that it should be compulsory to report weights, composition and disposal location of waste material for waste companies. This should be reported to central government so that reporting is standardised across the country. We do not see this as a territorial authority's role to enforce, unless there are laws in place to make it easy to do so.

Q43. What regulatory or other changes would help better manage inappropriate disposal of materials (that is, littering and fly-tipping)

35. Council believes that strong and clear incentive mechanisms are required to better manage inappropriate disposal of materials. In addition, clearly defined territorial authorities' power to impose infringements and fines would be beneficial.

Ngā mihi



Neil McCann

Group Manager, Infrastructure Services