

21 June 2022

Draft Waste Minimisation and Management Plan 2022 Submission  
Ashburton District Council  
P O Box 94  
Ashburton 7740

Attn: Waste Team

Dear Sir/Madam

**Submission on the Ashburton District Council Draft Waste Minimisation and Management Plan 2022**

Thank you for the opportunity to submit on the Ashburton District Council Draft Waste Minimisation and Management Plan 2022.

EnviroWaste Services Limited (EnviroWaste) is a national waste service provider. EnviroWaste has 74 operating sites throughout New Zealand. Sites include collections depots, materials recovery facilities, transfer stations, cleanfill, landfills and solid and liquid hazardous waste treatment facilities. EnviroWaste operates approximately 600 vehicles and has 1100 staff.

EnviroWaste operates the following waste management facility that services Ashburton:

- EnviroWaste Refuse Transfer Station and Collections Depot, at 25 Range Street.

EnviroWaste also owns and operates a hazardous waste treatment facility in Christchurch where some of the waste from Ashburton is treated before disposal.

As a general comment, EnviroWaste supports the Council's vision of managing waste responsibly and working towards circular systems, and in particular supports the following objectives:

- O1. *Work in partnership with the waste sector, neighbouring councils, and local community to raise awareness of waste issues;*
- O3. *Reflect the WMA's waste hierarchy by emphasising and prioritising reduction, reuse, recycling, and recovery in our Action Plan;*
- O4. *Improve information collection and analysis to ensure we know what waste exists in the district and where it is going.*
- O6. *Work with the waste sector to increase the range of reuse, recycling, and recovery options available in the district, maximising the economic benefit to the community.*

- O7. Consider the total cost to the local community when choosing waste management options.
- O8. Consider the environmental impact of all options and seek to choose options with the least overall environmental impact.
- O9. To consider the public health impacts of all waste management options and seek to choose options which protect human health.

In respect of the Council's proposed Action Plan we have the following comments:

#### *Regulation*

EnviroWaste supports the implementation of the bylaw, requiring operators to be registered and moderate to large construction sites providing a SWMMP. However, to be effective, the requirements of the bylaw will require a public education programme.

Additionally, we would like to draw attention to the difficulty in consenting new organics processing facilities, which would be necessary to implement the diversion of food waste. There is no specific definition or provision in the current District Plan for a facility that composts bulk household food waste. There should be a clear consenting pathway for organics processing facilities. This would then allow a faster take-up of a food waste collection service.

#### *Data*

EnviroWaste supports the use of high-quality data to track progress. External data collection using waste bylaw provisions will assist in measurement of waste quantities, but may have limited applicability on the breakdown of waste collected or disposed. The use of surveys will be necessary to determine the waste categories.

#### *Education, Engagement, Communications*

EnviroWaste supports maintaining community engagement and involvement, with one-off campaigns for new services or service changes. Education at a household/business level is often key to lessen contamination of waste streams. We have considerable experience in campaigns related to waste services delivery and would be happy to share our experiences with Council.

#### *Collections*

EnviroWaste supports Council's proposals in respect of extending collection services. However, while food waste collection will divert organics from landfill (which captures a high proportion of greenhouse gas emissions from organic wastes) it should be subject to a vigorous cost-benefit analysis. In addition it needs to be integrated with an appropriate

processing facility/facilities if potential adverse effects in respect of greenhouse gas emissions, odour and leachate are to be avoided. Extending green waste collections will be key to processing food waste through an efficient composting system. EnviroWaste is happy to share its experience in organic waste processing to assist Council in assessing options.

The provision of a working group with waste companies to facilitate improved and targeted services is welcomed, with the knowledge that each waste stream requires appropriate environmental management in dedicated facilities which can take time to consent and implement. EnviroWaste would however be happy to assist Council in such a working group.

#### *Infrastructure*

EnviroWaste supports the establishment of a transfer station at Methven, and the development of the ARRP as the key facility for the district. We suggest that Council engage with the private waste industry when investigating additional service provision and for further separation of waste types.

#### *Leadership and Management*

EnviroWaste supports Council advocating to Central Government on issues such as product stewardship. In particular we consider the provision of product stewardship schemes for hazardous chemicals, waste electrical and electronic equipment, Li-ion batteries and end of life tyres to be a priority.

In summary, EnviroWaste generally supports Council's proposals in the Draft Waste Management and Minimisation Plan. We would be happy to make available the knowledge and experience of our staff to assist the Council in undertaking investigations and assessments and in developing new waste services and facilities in the future.

EnviroWaste would like the opportunity to be heard in support of this submission.

Yours sincerely



Laurence Dolan  
Environmental Manager