

WASTE MINIMISATION IN NEW ZEALAND

SUBMISSION TO THE MINISTRY FOR THE ENVIRONMENT

15 MAY 2009

This is a joint submission between the Institution of Professional Engineers New Zealand and INGENIUM. Background information about these organisations is presented below.

BACKGROUND TO IPENZ

The Institution of Professional Engineers New Zealand (IPENZ) is the lead national professional body representing the engineering profession in New Zealand. It has approximately 10,000 Members, including a cross-section from engineering students, to practising engineers, to senior Members in positions of responsibility in business. IPENZ is non-aligned and seeks to contribute to the community in matters of national interest giving a learned view on important issues, independent of any commercial interest.

BACKGROUND TO INGENIUM

INGENIUM is the brand name of the Association of Local Government Engineering New Zealand Incorporated and its membership, comprising mainly engineers, represents the technical/professional engineering expertise that services local authorities in New Zealand. INGENIUM's 900 members comprise mainly staff of local authorities, consultants and contractors who manage and operate the infrastructural assets of local authorities and are responsible for providing the following local authority services: roads, bridges, footpaths, water supply, sewerage, stormwater, land drainage, solid waste and flood protection.

EXECUTIVE SUMMARY

IPENZ and INGENIUM (“we”) support the objectives sought by the New Zealand Waste Strategy.

We support the majority of the criteria set for the Waste Minimisation Fund. However, we recommend that the criteria be split into two kinds of criteria – criteria for establishing eligibility for funding and criteria for prioritising projects for funding. We consider that this distinction would provide applicants with clarity and enable the Ministry to prioritise projects according to its priorities, particularly if the fund is over-subscribed.

We support the collection of national waste data and consider that this data will enable the Ministry to develop appropriate policy interventions where necessary. We consider it important that guidance is provided to landfill operators to enable them to estimate waste volumes and composition, as a weighbridge may not be appropriate for every waste disposal facility.

We consider that the waste levy should not apply to cover material or the materials used to construct waste disposal facilities and the associated infrastructure. Cover material is an essential resource for waste disposal facilities and used for a constructive purpose. We therefore strongly recommend that cover material be exempt from the waste levy.

STRUCTURE OF THIS SUBMISSION

This submission presents our views on the five parts of the discussion document.

SUBMISSION

PART 1: REVISING THE TARGETS FOR THE NEW ZEALAND WASTE STRATEGY

General Comments

We note that an underlying goal for the New Zealand Waste Strategy (“the Waste Strategy”) is to decouple waste and economic growth (gross domestic product). This was the goal when the Waste Strategy was first developed and it is still a worthwhile goal to aim to achieve. We recommend that this goal be clearly stated in the revised Waste Strategy.

We note that the Waste Strategy was developed to cover solid, liquid and gaseous wastes. The revised targets indirectly cover gases (greenhouse gases in target 3) and liquid waste (target 11). We question the limited focus on liquid (for example, trade wastes) and gaseous wastes given the large volume (particularly of liquid waste) that is generated in New Zealand.

We note the use of “by 20XX” as timeframes for the targets. At the Wellington Consultation Workshop on 3 April we were informed that these timeframes were meant to be interpreted as by 31 December 20XX. We recommend that the timeframes be clarified to say “by the end of 20XX” or “by 31 December 20XX” to make this clearer.

Specific Comments on each Revised Target

Target 1: By 2015, reduce the quantity of waste (tonnes) disposed to landfill per person per year by 20 per cent relative to an established 2010 baseline.

What is your view on target 1?

We support the aim of reducing the quantity of waste that is disposed to landfill. However, we question how the 20 per cent reduction target was generated and the basis for choosing 20 per cent as the target. We recommend that the Ministry consider the OECD figures and use these figures as the basis for calculating a reduction target for New Zealand (if this wasn’t done in identifying the 20-per-cent target).

We are aware that from July 2009 more robust data on tonnages to landfill will be collected. This will help greatly with setting the baseline and also measuring progress towards this target.

We note that the baseline will be set based on the quantity of waste that goes to landfill between 1 July 2009 and 30 June 2010. We note that with the current recession it is likely that less waste will be sent to landfill than if there was no recession. Therefore, the target of reducing the quantity by 20 per cent below a 2010 baseline may be more ambitious than initially intended and this needs to be carefully considered.

Is the timeframe for achieving target 1 realistic?

Waste Indicators Data¹ shows that between 1995 and 2006 the per-capita rate of solid waste to landfill decreased from 898 kilograms per person per year to 784 kilograms per person per year in 2006. This represents a 12.7 per cent decrease over a period of 11 years.

The new target of 20 per cent reduction is over a period of five years which seems very ambitious.

Target 2: By 2010, have a system in place for the ongoing monitoring of the composition of waste to landfill.

What is your view on target 2?

We support the target to have a system in place for monitoring the composition of waste to landfill. We consider it vital that information is known about waste composition as it will highlight particular parts of the waste stream for which further policy intervention may be required.

Is the timeframe for achieving target 2 realistic?

Assuming that assistance will be provided to landfill operators (for example, methodology for estimating composition if the landfill doesn't have a weighbridge) this timeframe seems appropriate. If assistance is not made available or appropriately resourced then the timeframe for this target may be too tight.

Target 3: By 2012, have a system in place for the ongoing monitoring of the composition of organic waste, the amount disposed of at landfills and diverted from the waste stream.

What is your view on target 3?

We note the considerable potential that organic waste represents as it can be recovered for beneficial uses such as composting. We support moves to know, more accurately, the volume of organic material that is disposed of and diverted.

While we note that detailed tonnage data is not currently available for organic material, we note that some data is available. The discussion document notes that Waste Not Consulting estimates that about a quarter of the waste disposed of to landfill is organic waste. If this figure is accurate then approximately 0.8 million tonnes of organic waste is sent to landfill each year. This is a significant volume and presents large potential for beneficial reuse and diversion from landfill.

To encourage diversion we recommend that there be an additional target – target 3A as outlined below:

Target 3A: By 2018, reduce the quantity of organic waste (tonnes) disposed to landfill per person per year by X per cent relative to an established 2013 baseline.

This target would allow time for establishing the monitoring system, a baseline and then reduction (diversion) over time. We consider that the actual reduction target should be calculated based on OECD targets of other countries, assuming they exist.

¹ MfE website - <http://www.mfe.govt.nz/publications/ser/enz07-dec07/chapter-6.pdf>

Is the timeframe for achieving target 3 realistic?

The discussion document notes that current information is available only from four landfills. Assuming that the target date of 2012 is December 2012, this timeframe seems appropriate.

Target 4: By 2012, have a system in place for the ongoing monitoring of the generation and composition of construction and demolition waste, the amount diverted from the waste stream and the amount disposed of.

What is your view on target 4?

We note that construction and demolition waste represents a significant volume of waste. The discussion document states that approximately 2.7 to 3.7 million tonnes is sent to cleanfill per year. We consider that this material presents potential for reuse.

We support the target to put in place a system to monitor the volume of construction and demolition waste.

We would like there to be a diversion target to encourage the diversion of construction of demolition waste. We note that smaller cleanfills do not have to be consented and are not monitored by local authorities. We recommend that all existing cleanfills be identified and monitored to enable the tracking of tonnages and inclusion of a diversion target in the future.

Is the timeframe for achieving target 4 realistic?

Given the need to obtain information from cleanfills and landfills, we consider that establishing systems will take considerable time and that the 2012 timeframe may be a little tight. However, this work is a priority and we recommend that the 2012 timeframe be retained.

Target 5: By 2012, the Ministry for the Environment will have established a national tracking system for all hazardous waste.

What is your view on target 5?

We consider that this target is confusing and needs some rewording to provide clarity.

As the discussion document states, the Ministry for the Environment already has WasteTRACK for the tracking of hazardous waste. We understand that WasteTRACK is flexible and able to track all wastes, not just liquid hazardous wastes as it does currently. We consider that the Ministry should proceed with using WasteTRACK to track hazardous waste given the time and money already invested in it.

We consider that given the Ministry has WasteTRACK, it technically “has” a national tracking system and the problem is not that there is no system but rather that the uptake of the system has been low. We therefore suggest that the target be reworded as follows:

“By 2012, 10 per cent of hazardous waste will be tracked using WasteTRACK”

We are unsure as to whether the quantity of hazardous waste in New Zealand is known. If the total quantity is not known then this target will not be suitable, as it would not be possible to know the percentage of waste that is being tracked. An alternative target may be:

“By 2012, 10 per cent of hazardous waste operators will be tracking their hazardous waste using WasteTRACK”.

We note that hazardous waste companies tend to have their own tracking systems and may be resistant to voluntarily changing to another system. Also, some, particularly smaller, companies may need assistance to transfer over to the national tracking system.

However, we consider it important that the entire waste industry is encouraged to use the same system and that the Ministry enable this by having sufficient resources to assist industry operators in using the system.

Is the timeframe for achieving target 5 realistic?

We consider that the timeframe is appropriate.

Target 6: By 2011, the Ministry for the Environment will have investigated the need for, and propose if warranted, regulatory standards for storage, transport, recycling, recovery, treatment and disposal of hazardous wastes.

What is your view on target 6?

We support the investigation of the need for regulatory standards. However, we consider that this activity should occur after the majority of hazardous waste is being tracked with the national tracking system. Investigations undertaken before the majority of hazardous waste is tracked may miss issues with particular hazardous wastes.

Is the timeframe for achieving target 6 realistic?

We recommend that this target is set to be achieved after the majority of hazardous waste is tracked using the national tracking system and therefore a target of by 2011 is not appropriate.

Target 7: By 2012, specific industries will develop at least three accredited product stewardship schemes that increase the recovery or recycling of the hazardous components of waste.

What is your view on target 7? Is the timeframe for achieving target 7 realistic?

To date, product stewardship has appeared to be unsuccessful in managing hazardous components of waste and we therefore question the use of this target.

We consider it important that all producers of products that contain hazardous components are supported and encouraged to recover, reuse or recycle the hazardous components. This practice will lead to better design of products and may help to reduce or eliminate hazardous components.

Target 8: By 2014, specific industries will develop at least two other accredited product stewardship schemes that result in a reduction in hazardous substance production at source.

What is your view on target 8? Is the timeframe for achieving target 8 realistic?

Please see our comments on target 7, which are also valid in response to target 8.

Target 9: By 2015, regional councils will have established satisfactory systems to record information on contaminated sites and will have assessed which sites pose a high environmental risk.

What is your view on target 9?

Contaminated sites pose potential health and environmental risks which need to be managed carefully. We support this target as a step towards managing these risks.

We question how “satisfactory” will be interpreted in this target and recommend that the word “satisfactory” be removed from this target.

Is the timeframe for achieving target 9 realistic?

This target requires regional councils to have assessed which sites pose a high environmental risk. We consider that this is a priority for regional councils and the Ministry and we encourage the completion of this task as soon as possible.

Target 10: By 2020, regional councils will have investigated all contaminated sites identified by 2015 as high risk, and will be implementing an action plan for their management and/or remediation.

What is your view on target 10?

As with target 9, we support the investigation of contaminated sites to minimise the risks posed by these sites. We note that most contaminated sites are not owned by regional councils and some are in private ownership, which means that actions can be more limited. We consider it important that appropriate funding be available to enable fulfilment of this target.

Is the timeframe for achieving target 10 realistic?

We consider that the actions associated with this target could be undertaken concurrently with the actions associated with target 9. We therefore consider that the timeframe of 2020 is appropriate assuming that sufficient funding is available (through regional councils and/or the Contaminated Sites Remediation Fund) for management and/or remediation.

Target 11: By 2015, all waste disposal facilities (including wastewater treatment plants, landfills, cleanfills and onsite wastewater systems) will be meeting existing regulatory standards and will be consented if this is a requirement.

What is your view on target 11?

We question the need for this target. Inclusion of this target implies that waste disposal facilities are not currently meeting the regulatory standards or having consents where they are required. We would be concerned if this was the case, as these requirements should be business as usual, not a target. We would have assumed that regional councils are undertaking enforcement action where regulatory standards are breached or facilities are not consented as they should be.

This target should therefore be unneeded and we recommend that this target be removed.

Is the timeframe for achieving target 11 realistic?

If this target is pursued then we recommend that the timeframe be set at “as soon as possible”.

Target 12: By 2010, the Ministry for the Environment will assess the need for a national environmental standard addressing environmental management of solid waste disposal facilities.

What is your view on target 12?

We support the use of National Policy Statements and National Environmental Standards (NES). We support the investigation of the use of a NES for the management of solid waste disposal facilities as a NES could provide national consistency and clarity.

Is the timeframe for achieving target 12 realistic?

We consider that this timeframe is appropriate.

Target 13: By 2012, the Ministry for the Environment will have implemented a waste monitoring and reporting programme to generate consistent data on national waste streams including waste to cleanfills and other disposal sites (for example, industrial landfills).

What is your view on target 13?

We support this target as we consider that it is important that national data is obtained to inform policy decisions. We consider that the inclusion of cleanfills and other disposal sites is important.

However, we note that the actions associated with this target are huge and note that the Ministry will require significant resources to comply with this target.

Is the timeframe for achieving target 13 realistic?

We note that targets 2, 3, 4, and 5 will be instrumental in achieving this target. Target 2 is to be achieved by 2010 and will enable the better monitoring of waste to landfill. Targets 3, 4, and 5 are all to be achieved by (December) 2012 and will provide better information on organic waste, construction and demolition waste, and hazardous waste.

We consider that the fulfilment of targets 2 to 5 will need to occur at about the same time as this target. We therefore consider that the timeframe of 2012 is appropriate.

Target 14: By 2012, the Ministry for the Environment will work with local authorities to develop a national reporting template that councils will use to report to the Ministry on progress against their waste management and minimisation plans and other waste-related activities.

What is your view on target 14?

We support the development of a national reporting template as we consider it will save not only the Ministry but also local authorities' time as consistent information will be required and reported.

Is the timeframe for achieving target 14 realistic?

Given that the reporting will need to link with work proposed under targets 2 to 5, we consider that this timeframe is appropriate.

Are there any additional high-level targets you would like to propose? If so, what is the waste issue you think the proposed target should address, what information is available to monitor progress towards the target, and what timeframe do you think should apply?

Above, we proposed target 3A which is a reduction target for organic waste. We propose one further target for the management of contaminated sites as follows:

Target 15: By 2012, the Ministry for the Environment will have investigated the use of a National Environmental Standard to manage contaminated sites.

We recommend that a National Environmental Standard be investigated for the management of contaminated land. We consider that a National Environmental Standard could provide national consistency, particularly if it set thresholds at which land was considered “contaminated” and “high risk”. This would provide regional councils with more certainty, although we note that some liability issues may occur if thresholds are set and later found to be inappropriate.

PART TWO: IDENTIFYING PRODUCTS THAT ARE PRIORITIES FOR PRODUCT STEWARDSHIP

Which products do you think should be the highest priority for a mandatory product stewardship scheme? These may already be one of the products we have identified, or they may be other products you think we should consider.

An IPENZ Member suggested that structural steel should be considered as a priority product. Structural steel maintains its durability over time and could be easily recycled. The recycling of “used” steel into the steel manufacture process results in the need for less raw materials and the emission of less greenhouse gases.

Is there anything else we need to consider?

We note that voluntary product stewardship schemes do not always work as well as they could because the targets are self-imposed. In addition, we note the targets can sometimes be achieved simply by focusing on the large metropolitan areas and not the entire country.

We therefore encourage the Ministry to closely monitor voluntary product stewardship schemes to ensure they achieve tangible results.

PART THREE: IDENTIFYING FUNDING CRITERIA FOR THE WASTE MINIMISATION FUND

- 1. Are the criteria identified by the Ministry for the Environment appropriate for determining projects that may be funded by the Waste Minimisation Fund?**
- 2. If you do not agree with the criteria, what changes would you suggest?**

We question what the objectives for the Waste Minimisation Fund are. We note that the Waste Minimisation Act states that the “Minister may approve funding of projects to promote or achieve waste minimisation”. We consider that having clear objectives will make setting criteria easier.

Our comments on each criterion are presented below.

1. Funding is for waste minimisation projects – waste minimisation covers the reduction of waste and the reuse, recycling and recovery of waste and diverted material.

We support this criterion, particularly the focus on reduction.

We question whether education programmes are intended to be eligible for funding. At the Wellington Consultation Workshop on 3 April the Ministry representatives indicated that they were eligible. If this is the case then we recommend that this criterion be reworded to say:

“waste minimisation covers the reduction of waste and the reuse, recycling and recovery of waste and diverted material, and public education to encourage these behaviours”.

2. Funding is for projects - it is not for the ongoing financial support of existing activities and nor is it for the running costs of organisations, individuals, councils or firms.

We support this criterion.

3. Funding will not be provided for projects where alternative, more suitable, funding streams already exist, such as the Sustainable Management Fund, the Contaminated Sites Remediation Fund, or research funding from the Foundation for Research, Science and Technology.

We note that in previous years the Sustainable Management Fund has had a funding category specifically for projects associated with waste. We recommend that this category be removed from the Sustainable Management Fund so that waste-related projects can be funded by the Waste Minimisation Fund.

In addition, it is not clear whether the alternative, more-suitable funding streams being referred to are central government funding sources or all (including private sector) funding sources. We assume that this criterion is intended to mean that a project can only tap into one pot of government funding, rather than receiving government funding from multiple sources. We support this concept.

We recommend that the criterion be reworded to provide clarity and our suggested rewording is:

“3. Funding will not be provided for projects where alternative, more-suitable central government funding streams already exist, such as the Sustainable Management Fund, the Contaminated Sites Remediation Fund, or research funding from the Foundation for Research, Science and Technology.”

4. Projects must implement new initiatives or expand on existing activities to address waste minimisation. The intention is to increase the range and scope of waste minimisation in New Zealand and not to duplicate existing activities in either the private or community sectors.

We have some concerns about this criterion. While we support new ideas, we consider that projects that seek to replicate activities in new areas of New Zealand should be eligible for funding.

For example, consider a scenario where activity A is already implemented in Wellington and an application is made to the Waste Minimisation Fund to implement activity A in Southland. We consider it appropriate that this project be eligible for funding.

If new initiatives rather than repetition are important then perhaps this could be a criterion for prioritising projects rather than assessing their eligibility for funding.

5. There must be a degree of confidence that the applicant can deliver the project.

We support the Ministry in seeking sound projects; however we question how the Ministry will assess confidence in an applicant.

6. There must be a degree of confidence that the project can achieve its goals.

We support this criterion and we assume that the Ministry will provide clear guidance for applicants as to what is required in an application to the Waste Minimisation Fund. This guidance will be needed to ensure that applicants provide sufficient information to satisfy the Ministry's criteria.

7. Funding can be for operational or capital aspects of a project. The level of funding from other sources is a consideration and part-funding is preferred.

We support this criterion although we note that this criterion could be further enhanced by rewording as follows:

"7. Funding can be for operational or capital aspects of a discrete project with a defined timeframe. The level of funding from other sources is a consideration and part-funding is preferred."

A significant downside of funds that are currently available (for example, the Sustainable Management Fund) is that they cannot be used for capital expenditure. For the waste industry, the ability to fund capital expenditure will be important as it will provide the opportunity for improved waste facilities where appropriate.

8. Projects will be assessed for their strategic value, from which other waste minimisation projects may benefit or be developed.

We support this criterion and the assessment of how projects fit with other work that is occurring. New Zealand is a small country and it is important that we do not reinvent the wheel. It is therefore important that lessons learnt in one part of the country can be transferred and used in other parts of the country.

As with other criteria, we question how the Ministry will assess projects against this criterion and we seek clarity on this.

9. Preference will be given to projects that collectively give the largest sustained net benefit in environmental quality from the funding available. This covers the cost effectiveness of the projects collectively and the extent to which they address the volume and harm associated with waste products.

We support the consideration of the costs and benefits of projects. The Waste Minimisation Fund has limited funds and may receive a significant volume of applications for funding. However, we recommend that this criterion be used to prioritise projects rather than assess their eligibility for funding.

3. Do you think additional items should be included in the criteria? These could include:

- a. **Scale**
- b. **Innovation**
- c. **Research and development**
- d. **Legacy waste**
- e. **Targeting to particular wastes or wastes streams**

f. Repayment conditions.

Our views of each of these potential criteria are presented below.

a. Scale

We do not support scale as a criterion. We consider that projects of all sizes can provide positive outcomes. Determining a project's eligibility based on scale therefore seems inappropriate. The key is cost effectiveness of projects, rather than scale.

b. Innovation

We support innovation, however we consider that innovation does not need to be a criteria for funding. We consider that a project does not necessarily need to be innovative to be a worthwhile project. If the Ministry considered innovation to be important then this could be a criterion on which to prioritise projects, rather than assess projects for funding.

c. Research and development

We are supportive of the role of research and development; however we do not consider that research and development should be included as a criterion. As with innovation, if the Ministry considered research and development to be important then it could be a criterion on which to prioritise projects, rather than assess projects for funding.

d. Legacy waste

We consider that the use of the Waste Minimisation Fund funding may be appropriate for legacy wastes. However, again we consider that whether the waste is legacy waste or not should be a criterion for prioritising rather than assessing projects' eligibility for funding.

e. Targeting to particular wastes or waste streams

We consider that a broad range of projects should be eligible for funding from the Waste Minimisation Fund, not just those projects dealing with specific waste streams.

However, we note that the Ministry has interest in particular waste streams (for example, organic and construction and demolition waste). We also note that the Ministry has relatively few powers to bring about waste minimisation for particular waste streams. We recommend that the Ministry consider prioritising projects (but not determining eligibility) based on the waste stream projects are focused on. This prioritisation would help bring about the behaviour changes that the Ministry seeks for particular waste streams.

f. Repayment conditions

We note the ability for payments to be by way of a loan or a grant. We note that the administration of loans can be more onerous and lead to higher administration costs. We therefore recommend that funding occur through the provision of grants.

4. Do you have any other comments to make on the operation of the Waste Minimisation Fund?

We question whether the criteria proposed are criteria for eligibility or criteria for prioritising projects. Criteria for eligibility can be used to define which projects are and aren't able to seek funding from the Waste Minimisation Fund and criteria for priority can be used to determine which projects are funded when the Waste Minimisation Fund

is over-subscribed. Given that at some point in the future the Waste Minimisation Fund may be over-subscribed, we consider that both sets of criteria should be developed.

Summarising our views expressed above, we consider that a project should be eligible for funding if:

- it is a waste minimisation project
- it is discrete (i.e. has a set end date and does not seek ongoing financial support or funding for the running costs of an organisation)
- there are no other appropriate government funding sources for the project
- the Ministry has confidence that the applicant can deliver the project
- the Ministry has confidence that the project can achieve its goals.

Once a project is assessed as eligible, we consider that the Ministry could then prioritise projects, potentially using the following criteria:

- the project's ability to implement new initiatives
- the project's other funding sources (i.e. prioritise a project if it is seeking part-funding)
- the project's strategic value
- the innovation provided by the project
- the fit of the project with the Ministry's priority wastes (for example, organics and construction and demolition wastes).

These criteria could be changed according to Ministry priorities and set (and preferably published) prior to each funding round.

PART 4: MONITORING WASTE IN NEW ZEALAND

1. Do you consider that waste facility operators should be required to supply data on the composition of waste disposed of at landfills?

We support the collection of national waste data and consider that only by obtaining waste composition data will the Ministry be able to accurately assess issues posed by specific waste streams. For that reason we think that waste facility operators should supply the Ministry with waste composition data.

2. If so, are the waste classifications proposed the right ones?

We note that the classifications proposed are a mixture of waste streams and sources of waste. We assume these classifications have been developed based on the information that landfills can provide. We consider that the classifications should mirror those used in the Solid Waste Analysis Protocol, if possible. This would enable comparison with historical data and use classifications which have already been tested.

We recommend that once the classifications are established the Ministry prepare a template that all waste disposal facilities can use to report tonnages and composition. This will help the waste operators and save them time and also help the Ministry when it receives waste data from the waste disposal facilities as the data will be in a consistent form.

We note that the discussion document mentions weighbridges. We consider that weighbridges will not be appropriate for all landfills as the volume handled for some landfills is small and the installation of a weighbridge would not be worthwhile. We assume that the Ministry will provide guidance to landfill operators to enable them to estimate the volume and composition of waste where their landfills do not have a weighbridge.

3. What are the practical implications of gathering this compositional data?

We consider that extending this requirement to compositional data should not be overly burdensome for waste disposal facility operators. As noted above, we recommend that the Ministry provide guidance to landfill operators so that they can estimate the volume and composition of waste if they do not have a weighbridge.

4. Do you think it will impose additional costs on landfill operators, what will those costs be, and do you think they are reasonable?

Costs of installation can be high in some instances where considerable civil works, electronic charging systems and hardware and software are required. If there are additional costs, we consider that these costs should be transferred on to waste generators via landfill fees and charges or local levies.

5. Can you suggest other options for obtaining compositional data that would be more efficient and effective?

We have no other options to suggest.

PART 5: IMPROVING THE OPERATION OF THE WASTE LEVY

1. What is the maximum amount of cover material required for effective environmental management purposes (up to 10 per cent of the weight of waste deposited in the landfill)?

Landfills need cover material to minimise odour and vermin issues. Landfills use varying amounts of cover material and it is difficult, and potentially inappropriate, to estimate a maximum amount of cover material relative to the waste volume. We recommend that the Ministry does not attempt to set a maximum amount of cover material that landfills can use as this may adversely affect the management of landfills.

2. Should material used for environmental management purposes be exempt from the waste levy? If not, why not?

We consider that materials used for environmental management should be exempt from the waste levy. In the case of cover material, this material is either won from elsewhere on the landfill site (i.e. soil excavated) or purchased. In either of these cases the cover material is a resource and being used for a constructive purpose rather than being placed in a landfill for disposal.

We also consider that the materials associated with construction of a landfill and associated infrastructure should also be exempt from the waste levy. We consider that exempting these materials could incentivise reuse. For example, crushed glass could be reused as base course in the roading that is required around the landfill, which would divert the glass from the landfill.

If so: What should be the maximum allowable percentage of cover material exempt from the levy?

We think it is inappropriate to set a maximum percentage. The excavation or purchase of cover material costs a landfill time and/or money and they are therefore unlikely to use more cover material than required.

One issue we do perceive is landfills receiving “cover material” which is actually waste mixed with soil. To overcome this issue, we recommend that the Ministry produce criteria to clarify what is and isn’t suitable for use as cover material. We note that these criteria should be broad enough to encourage innovation as alternative cover materials may become available in the future.

What are the benefits of a zero rate for cover material?

We consider that cover material being exempt from the levy will enable landfill operators to continue to use appropriate amounts of cover material to minimise odour and vermin issues.

Would this impose any additional operational costs?

Assuming cover material is exempt from the levy there should not be any additional operational costs incurred.

3. Are there any other options for addressing the potential perverse effects of applying a \$10-per-tonne levy rate?

We have no other options to suggest.

CONCLUSION

IPENZ and INGENIUM appreciate the opportunity to make this submission and are able to provide further clarification if required.

Tim Davin

Director – Policy