

Draft Submission by the Wellington Regional Council
on
“Towards a National Waste Minimisation Strategy” -
Advice of the Waste Minimisation and Management Working
Group established by the Minister for the Environment and Local
Government New Zealand

1. Introduction

Before addressing the issues for feedback, the Wellington Regional Council (WRC) would like to make some overall comments on the waste minimisation strategy as follows.

WRC has made a commitment to reducing waste and minimising the impacts of waste disposal within the Wellington Region. The Wellington Regional Policy Statement contains a number of policies and methods aimed at achieving this goal. We consider that the Waste Minimisation Strategy is consistent with the Wellington Regional Policy Statement.

The waste minimisation strategy seeks to address a growing problem in New Zealand and the rest of the world. However, it falls slightly short of addressing the entire waste stream in New Zealand. The strategy has a strong landfill and solid waste focus. Little attention has been given to other waste disposal options and waste types, such as trade waste, biosolids and air discharges. The waste minimisation strategy is a document that is looking to the future. The document alludes to the fact that landfills are not the most appropriate way to dispose of waste but neglects to analyse other disposal options” If other disposal options are not addressed, they may become more favourable for disposal than a landfill and in turn only move the receiving environment instead of minimising the problem.

Another missing link in the strategy is the strong focus on waste disposal or management rather than a focus on waste generation or minimisation. All too often waste management is mistaken for waste minimisation. Emphasis needs to be made on reduction at source.

We are also concerned about whether the June 2001 deadline is realistic. The strategy must be comprehensive and well thought out if it is to work. It is more important to ensure it is robust and workable than complete by June 2001.

We now address each of the issues for discussion in turn.

2. Issue One – Changing the way we view waste

The way New Zealanders view waste must be altered to achieve any waste minimisation goals. We live in a throwaway society, where no thought is given to what happens to materials after we have finished with them. If we considered these materials as a valuable resource, we would be less inclined to throw them away.

We need to be realistic as to how quickly we can achieve a dramatic change in focus. Viewing waste as a resource is the ideal but people's attitudes will take a number of years to change. A good example is the national 'Drink Drive' campaign. Attitudes have been slow to change and a few refuse to change, as is evidenced by the numbers still prosecuted for excess blood alcohol levels. This campaign comprised national promotion, education and disincentives such as loss of licence, fines and the risk of accidents.

We suggest that any campaign to change attitudes follows a similar approach to the 'Drink Drive' campaign. There needs to be a wide promotion of the benefits of waste minimisation at the national level so that a consistent message reaches all New Zealanders. Technical advice and enforcement must support the promotion and education of waste minimisation techniques.

Legislation may also help to change views, particularly those of manufacturers and importers. 'Take back' policies and tariffs on materials that cannot be re-used or recycled may change the way products are packaged and manufactured and therefore eliminate waste before it is created. The Warehouse's gumboot initiative is relevant here. The gumboots were packaged in plastic bags that were removed at the Warehouse prior to sale and discarded. The Warehouse spoke to their suppliers and discovered there was no practical reason for the wrapping and so asked for it to be excluded from the packaging. Another example, not yet solved, is ice-cream that comes in non-recyclable containers. A tariff on the containers would encourage the manufacturer to use recyclable containers.

Waste Minimisation techniques can also be taught in schools. Environmental Education is a burgeoning field. However, focussing on schools alone would result in a much slower uptake of the message.

Lastly, any initiatives must be easy to understand and effortless to carry out. Our message must be simple to be effective.

3. Issue Two – Setting targets for waste reduction

The WRC considers that setting targets for waste reduction is important. We must be able to gauge our success (or failure) in reducing waste and targets give us something to work towards. However, care must be taken to choose appropriate targets. The targets must be SMART - specific, measurable, achievable, realistic and time bound.

If we want to achieve a percentage reduction in the amount of waste created, we must ensure our measurements are accurate. For example, reducing volumes at the landfill may not be a true indicator as material may be disposed of elsewhere, particularly through the trade waste system, incineration, cleanfills or construction and demolition fills, or illegal dumping. Similarly, it will be difficult to assess waste generated as opposed to waste disposed of, particularly as some generated materials (paper, glass etc) may end up as waste or as resource. Consequently, all waste disposal and generation options must be monitored to ensure accurate records are attained. Further, we must first establish a baseline of the waste generated and disposed. This baseline can then be used to determine progress towards our targets.

Any targets that are set must be achievable by all. Consequently, it may be more germane to include regional and local targets as well as national targets. An overall national reduction in

waste levels could result in some areas working harder than others. Additionally, some regions may have particular problem areas that they want to address, such as air discharges or industrial waste. It may also be appropriate to develop industry or activity specific targets. For example, the reduction of construction and demolition waste.

Targets should not be so easy that little work is required nor so hard that the task is insurmountable. Some Councils or industries have been very active in the waste minimisation field and the results they have achieved should be suitable for setting realistic targets for others. Caution is also needed to ensure that those that have already made significant inroads are not penalised. For example, the packaging industry has significantly reduced volumes over the past 10 years, but still could make improvements.

As waste minimisation is a long term process, given that we have to change the way we view waste, targets should have medium term timeframes (3-5 years) with short term interim measures or goals to see how we are going (1-3 years). An incremental approach should be taken, using the short term targets to gauge whether our long term goals are realistic and achievable. Further, the targets should be regularly reviewed to ensure that they aid the strategy's waste reduction objectives.

Whether the targets should relate to specific types of wastes should be addressed by the priorities. Any waste streams identified as priorities should have targets associated with them.

Targets should be mutually determined by national and local government, tangata whenua, industry and the community. They must be set through a consultation process and then implemented with incentives or disincentives and regulation to be successful. Another issue that should be considered is, what happens if targets are not met. Are the targets enforceable?

4. Issue Three – Roles and Responsibilities

The strategy suggests roles that are inconsistent with the Local Government Act 1974, which charges local authorities with the responsibility for dealing with waste. Some changes to the legislation will be required if the roles and responsibilities are to be altered.

We agree that regional co-ordination of waste minimisation techniques is required. Regional Councils have been reluctant to take on such a role as it has not been specifically provided for in the legislation. Resources have not been allocated to this area in the past but this could easily be resolved through the introduction of a waste disposal levy.

There may also be cross-regional issues and Regional Councils must be provided with the flexibility to work together to achieve the common national waste minimisation goal, rather than allowing the waste to be diverted to another region. Quite often another region or district can end up dealing with waste that is generated elsewhere. Here in Wellington, an example is stock truck effluent. Trucks must be clean before they board the Cook Strait ferries and so this waste is disposed of in Wellington prior to the trucks boarding the ferries. This issue is currently being addressed through the co-operative efforts of a number of local authorities and the industry concerned.

In addition to regional co-ordination, some co-ordination at the national level may be required to ensure consistency between the regions. The Ministry may wish to consider establishing a group of technical experts to accurately and consistently measure the relative success of waste minimisation initiatives of each region. This group could also provide advice on initiatives and carry out monitoring and audits of waste disposal within each region, ensuring national consistency.

5. Issue Four – Matauranga Maore and Kaitiakitanga

We consider that tangata whenua are best able to respond to this issue.

6. Issue Five – Introducing a waste minimisation levy

The WRC supports the introduction of a waste minimisation levy in principle but retains some reservations regarding its implementation and operation. The adoption of a levy scheme would allow money collected under the scheme to be used to fund waste minimisation initiatives. Care must be taken to ensure that the fund is not used unnecessarily on administration (no more than 10%). The levy should also apply to all waste disposal options (trade waste, incineration, cleanfills, other discharges to the environment, etc.) and not just to landfills.

A potential pitfall of the levy scheme is that it relies on the disposal of waste to generate the funds. The large volume waste streams, such as green waste and paper, are more easily diverted from the waste stream and so will most likely be diverted first resulting in less waste, to which the levy may be applied, and therefore less funds. Hazardous waste on the other hand is a small component of the waste stream and difficult and costly to deal with. It may therefore be necessary to raise the levy prices as volumes of waste are reduced.

The levy must be simple and easy to understand and use. Applying a higher levy amount to certain waste streams may be too complex and onerous and may not even reflect the impact that waste stream is having on the environment.

Issue One, for discussion, was all about changing our views and attitudes to waste. We should consider wastes as a resource and therefore any materials being reused, (e.g. green waste for composting and resale) must not be considered as waste and should not attract the levy. However, if green waste, (for example), is landfilled and not composted, then it should attract the levy. In other words, the levy should only be applied to material if that material is being disposed of and not re-used or recycled.

The levy should be collected at a national level and then administered regionally. The levies could be collected from the landfill/cleanfill/incinerator/trade waste operator, based on the material they have received on site. Each operator would be required to keep accurate records and forward levies they have collected.

The most equitable way to distribute the funds would on the surface appear to be on a per capita basis. However, this form of funds distribution may not result in the achievement of the strategy's objectives. Some of the smaller regions (based on population) may struggle.

Typically, waste minimisation initiatives are more expensive to implement and operate off a small population base and therefore may need larger injections of funds to succeed.

The levy funds should be used for the following initiatives and projects:

- Measurement/audit of waste streams, volumes and composition (National team of experts)
- Community operations e.g. recycling, composting etc
- Promotion and motivation
- Education of industry, community and schools
- Subsidising recycling schemes, if necessary

7. Issue Six – Deciding what works best

There are many tools or systems that can be used to prevent and minimise waste generation. Which tools or systems work best depends on the objectives, goals and priorities, be they to reduce virgin material use/extraction or to prevent impacts on the environment during the disposal and breakdown of materials.

The systems and tools that work best will have the following attributes:

- Large reduction of environmental damage/risk
- Simple to implement
- Cheap to implement
- High impact for the money spent
- Large reduction in volumes

There are a lot of criteria to consider and deciding what works best is not a simple task.

8. Issue Seven – Identifying priorities

Before priorities can be identified, the environmental risk or damage must be determined and assessed. The risk or damage may occur at different stages of the product life-cycle. Some material may have more impact at the generation/extraction phase rather than at its disposal.

The WRC would like to see a reduction in the amount of hazardous waste generated and disposed of to landfills and other disposal options set as a priority. We appreciate that hazardous waste only constitutes a small component of the waste stream but the risks associated with this waste are significant. Removing this component from the waste stream will result in a long-term payback.

Any priorities that are set must be flexible because waste streams are not static and their composition and volumes will vary with time.

9. **Issue Eight – Getting everyone involved**

To get everyone involved, we must first educate them. We need to be able to show people what they can do themselves in everyday life and most of all it must be simple to put into practice. It is not enough to add ten cents to the price of a rubbish bag (through the levy). Everyone must be able to relate that increase to the landfill and the waste they generate.

Regulation, monitoring and enforcement may even be the most effective way of encouraging participation, particularly at the industry/business level. Business and industry are one of the largest contributors to the waste stream. More often than not, businesses require some financial incentive before they change their practices. Triple bottom line reporting is becoming more widespread and may also encourage businesses to become involved in waste reduction.

Everyone should be involved before the waste is generated. A promotional campaign should focus on waste reduction at source. We need to ensure that we do not focus on waste volumes at the landfill and what should be done with the material once it arrives. Recycling comes third on the R hierarchy and reducing and reusing waste must be promoted as well.

Promotion and education are key tools and there needs to be some sort of national co-ordination to get a consistent message to everyone.

10. **Issue Nine – Applying the principle of producer responsibility**

We agree that manufacturers and distributors should take on life-cycle responsibility, particularly for products that have no end use. The ice-cream containers example is again relevant. There is no incentive for the ice cream companies to investigate alternative containers for their product. Some sort of tariff or take back policy may be the encouragement they need.

Producer responsibility is even more prudent for hazardous materials and waste. For example agricultural manufacturers should take back empty chemical containers for re-use, rather than have the community dispose of them, often inappropriately.

Legislation must be introduced to achieve producer responsibility where it cannot be achieved voluntarily. Although it will be difficult to address our imported goods, the imposition of tariffs or take back policies will reduce waste before it is generated. Efforts should be targeted at reducing waste rather than managing waste once it is generated.

11. **Issue Ten – Putting the polluter pays principle into practice**

The polluter must pay and we fully support this concept. Already we can see evidence of the polluter pays principle through the resource consent process, where the cost of compliance with consent conditions can be considerable. However, the polluter pays principle is sadly lacking when it comes to Environment Court prosecutions and fines. The fines imposed are often a slap on the wrist and easily absorbed by the offender. In some cases it may even be cheaper to pollute and accept the small pollution fee imposed by the Court. Further, many

cases do not even reach the Environment Court as the Council involved considers the risk and costs associated with taking the case to court to be prohibitive.

Waste levies, tariffs on manufactures/distributors, and take back policies all support the polluter pays principle. We support these initiatives and the imposition of prohibitive fines for non-compliance.

12. Round up

The Wellington Regional Council appreciates the opportunity to comment on 'Towards a National Waste Minimisation Strategy' and would be happy to be involved with the Working Group as it works through the various issues.