

# **JOINT COMMITTEE ON THE WELLINGTON REGION WASTE MANAGEMENT AND MINIMISATION PLAN**

**MEETING OF 1 SEPTEMBER 2011**

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## **SUMMARY OF SUBMISSIONS, OFFICERS' RESPONSES AND RECOMMENDATIONS ON THE DRAFT WELLINGTON REGION WASTE MANAGEMENT AND MINIMISATION PLAN 2011**

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### **1 PURPOSE**

The Joint Committee is asked to:

- consider submissions on the draft Wellington Region Waste Management and Minimisation Plan (the draft WMMP) and officers' responses to the feedback received; and
- recommend amendments to the draft WMMP for referral to the Territorial Authorities of the Wellington region (the Councils); and
- recommend that the amended WMMP be adopted by each of the Councils.

### **2 SIGNIFICANCE OF DECISION**

The decisions sought from the Joint Committee are not significant, in that the Joint Committee is asked to agree recommendations for consideration by each of the Councils.

### **3 RECOMMENDATIONS**

That the Joint Committee on the Wellington Region Waste Management and Minimisation Plan:

- 1. Receive the information.*
- 2. Note that officers from each of the Territorial Authorities of the Wellington region have been consulted during the preparation of this report.*
- 3. Agree to recommend to each of the Territorial Authorities of the Wellington region (the Councils) that the draft Wellington Region Waste Management and Minimisation Plan 2011 (the draft WMMP) be amended as described in appendix 1 of this report.*

4. *Agree to recommend to the Councils that they adopt the amended WMMP, as soon as practicable.*
5. *Agree to recommend to Councils that the Joint Committee on the Waste Management and Minimisation Plan be continued with amended terms of reference which reflect an ongoing governance role for the Joint Committee, and include the ability of the Joint Committee to determine when it should meet and a procedure to rotate hosting and chairing of meetings.*
6. *Note that officers will prepare a final draft of the WMMP that incorporates the amendments identified in appendix 1 before the WMMP is referred to each Council for its consideration.*

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## 4 SUMMARY

The Waste Minimisation Act 2008 (the Act) came into force in September 2008. Under the Act territorial authorities are required to develop a Waste Management and Minimisation Plan (WMMP) by 1 July 2012.

In the second quarter of the 2011 calendar year, all territorial authorities of the Wellington region (the Councils) agreed to:

- participate in a regional Waste Management and Minimisation Plan (WMMP)
- notify a Wellington Regional Waste Assessment, March 2011; and
- consult, using the special consultative procedure, on a draft regional WMMP.

The Councils released the regional WMMP for consultation throughout the second and third quarter of the 2011 calendar year, depending on the consultation process chosen by each Council. Each Council elected its own method for advertising the consultation and publishing consultation documents, as appropriate for its community.

Written submissions from across the region were collated and forwarded to each Council for consideration. Public response to this initiative has been overwhelmingly positive, though a number of improvements to the draft WMMP have been identified.

Officers have summarised all submissions, including the small number of oral submissions received, and have prepared responses to these (refer **appendix 2**).

A summary of officers' recommended amendments to the draft WMMP is attached as **appendix 1**.

A copy of the draft WMMP as released for consultation is attached to this report as **appendix 3**.

### 4.1 Implementation

Regional Steering Group: To oversee the implementation of the regional initiatives it is proposed that a regional steering group be established. The group would initially comprise the senior council officer team that oversaw the development of the draft WMMP. In the longer term a more formal or stand alone vehicle may be adopted to implement regional actions and governance, though there are no proposals for such a vehicle at this stage.

Regional Governance Group: Political oversight and governance of the project ultimately rests with each individual Council. However, to facilitate coordinated political governance, it is proposed that the Joint Committee on the WMMP be continued with amended terms of reference. These terms of reference should reflect the Joint Committee's ongoing governance role, and include the ability of

the Joint Committee to determine when it should meet; and a procedure to rotate hosting and chairing of meetings. It is anticipated that meeting on a six-monthly basis would be sufficient.

## **5 CONSULTATION**

The draft WMMP has been consulted upon by each Council using the special consultative procedure, as required under the Act. Officers from each Council in the region have been consulted during the development of the summary of submissions, officers' responses and recommended amendments to the draft WMMP.

## **6 CONCLUSION**

The Councils across the Wellington region agreed to participate in a joint region-wide Waste Management and Minimisation Plan. A number of improvements to the draft WMMP have been identified and officers now recommend that the Joint Committee consider and agree that these improvements be reflected in amendments to the draft WMMP for referral to each Council for adoption.

## **Draft Regional Waste Management and Minimisation Plan: Summary of recommended changes**

### **Section A : Vision, Objectives, Goals, Outcomes**

1. Add specific reference to clean environs in both the goals & objectives and expected outcomes sections of the draft WMMP.
2. Add a new project under the Regional Action Plan to investigate a regional 'clean up our environs' programme.
3. Add an expected outcome of "reduced waste and greater responsibility and focus on management of waste within the private sector"

### **Section B: Regional Action Plan**

4. Amend Project R16 to specifically provide for an investigation of a possible regional approach to the recycling or recovery of used tyres.
5. Amend Project R16 to specifically provide for an investigation of a possible regional approach to E-waste.

### **Section C: Individual Action Plans**

#### ***Kapiti Coast District Council***

6. Add the action of ongoing support towards the goal of zero waste to landfill to the Kapiti Coast District Action Plan as action KC0.

#### ***Masterton, Carterton and South Wairarapa District Council***

7. Add a bullet point to WAI28 as follows: Investigate the viability of a future local landfill site.

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## **Upper Hutt City Council**

8. Amend the action plan by removing the sentence "As at 2010 Council's existing waste minimisation and management activities exceed the levy funding it receives and Council's focus therefore is to maintain existing waste minimisation activities and levels of services"

## **Hutt City Council**

9. Amend wording on how Council will use waste levy funding and on new initiatives to better reflect the Council's policy from:

*"as at 2010 Council's existing waste management and minimisation activities exceed the levy funding it receives and Council's focus therefore is to maintain existing waste minimisation activities and levels of service"*

to:

*"Hutt City Council adopted its first Environmental Sustainability in 2009 which included a number of waste management and minimisation initiatives -a number of which are now funded by the Waste Levy. Since that time Council's focus has been on maintaining and improving its levels of service within existing activities in the belief that within there is still room for improvement and that this is the best value for waste minimisation funds available. This does not however preclude Council from undertaking new initiatives within the same general activities identified above -as potential initiatives are researched and funding becomes available from Council or from efficiency gains or reprioritisation of existing budgets."*

## **Wellington City Council**

10. Amend Project WC12 to reflect the new initiative to provide Council funding support for recycling of paper in primary schools and early childhood centres, where this is link to education on waste minimisation outcomes. .
11. Amend Project WC11 to reflect the new service available to not-for-profit community groups to participate in Council provided suburban kerbside recycling.
12. Add a new action to 'Demonstrate Council leadership'.

25 August 2011

# Draft Regional Waste Management and Minimisation Plan: Report on Submissions

## 1 Introduction

In the second quarter of the 2011 calendar year, all territorial authorities of the Wellington region (the Councils) agreed to:

- participate in a regional Waste Management and Minimisation Plan (WMMP)
- notify a Wellington Regional Waste Assessment, March 2011; and
- consult, using the special consultative procedure, on a draft regional WMMP.

The draft WMMP comprises three key sections:

- a Strategy section dealing with vision, objectives, policies, outcomes and monitoring and reporting
- a regional Action Plan that identifies actions the region proposes to undertake collectively
- individual Council action plans, that identify actions to be undertaken by each Council.

This report is structured in a similar way. Generic feedback and/or feedback that is applicable to the entire region is discussed first. Specific feedback on Council's individual action plans is then discussed.

## 2 Consultation Process

The Councils released the regional WMMP for consultation throughout the second and third quarter of the 2011 calendar year, depending on the consultation process chosen by each Council.

Each Council elected its own method for advertising the consultation and publishing consultation documents, as appropriate for its community.

The Wellington medical officer of health was consulted on the Wellington Regional Waste Assessment and draft WMMP.

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A number of Councils elected to include the draft WMMP in their Annual Plan process. These Councils were: Upper Hutt City Council; Hutt City Council; Porirua City Council.

The remaining Councils (Masterton District Council; Kapiti Coast District Council; Wellington City Council; South Wairarapa District Council and Carterton District Council) released the draft WMMP under a stand-alone consultation process.

Oral submissions were heard either as part of an annual plan hearing (in the case of Porirua and Upper Hutt Councils), or at a Council committee meeting at either Wellington City or Hutt City, where a number of Councillors from across the regional were also present.

All Councils received copies of all submissions made on the draft WMMP.

### 3 Summary of Feedback

#### 3.1 Numbers of submission

Across the entire region 276 submissions were received on the draft WMMP. Submissions covered generic issues and/or issues specific to an individual Council's proposed action plans. A breakdown of where submissions were received across the regional is provided in table 1.

	Written submissions	Oral submissions
Kapiti Coast District Council	3	-
Porirua City Council	3	-
Wellington City Council	232	4
Hutt City Council	32	4
Upper Hutt City Council	5	2
South Wairarapa District Council	-	-
Carterton District Council	-	-
Masterton Council	1	1
<b>Totals</b>	<b>276</b>	<b>11</b>

The number of submissions received by Wellington City Council appears disproportionately high compared to other Councils across the region. This is because the release of the draft WMMP coincided with the adoption of a new recycling service by Wellington City and a corresponding removal of some (ad hoc) recycling services provided to some schools. Of the 232 submissions received by Wellington City, 207 dealt exclusively or almost exclusively with extending recycling to schools and early childhood centres across the City.



### 3.2 Feedback on Generic and Regional Issues

#### 3.2.1 *Overwhelming support for the regional approach and the WMMP*

Fifty submitters commented on the overall WMMP and its proposed regional approach. 98 percent of those commenting expressed general support for the approach being proposed. Only one submitter disagreed.

While nearly all submissions were positive about the draft WMMP, and the action plans it contains, a number of areas for potential improvement were noted by some submitters.

Officers' response: proceed with regional approach and overall structure of the draft WMMP.

#### 3.2.2 *Support for proposed vision, goals, objectives*

Overall there was support for the vision, goals and objectives in the draft WMMP. Five submitters commented specifically in support of these. In addition, 13 submitters who commented largely on the recycling in schools issue in Wellington also made generic comments in support of these sections of the draft WMMP. These submitters noted the important role schools can and should play in achieving the vision, goals and objectives. No submitters opposed these sections.

Officers' response: proceed with these sections of the draft WMMP without amendment.

#### 3.2.3 *Support for the proposed outcomes*

Twelve submitters commented in support of the proposed outcomes in the draft WMMP. A number made specific reference to the importance of reducing waste to landfill, increasing diversion of waste, and communities that are well informed about waste reduction issues. No submitters opposed the outcomes, though one submitter was concerned about the lack of specific targets for waste reduction, and commented that this would reduce pressure and accountability to achieve reductions.

Officers' response: the large majority of submitters support the proposed outcomes as drafted. The use of specific targets for waste reduction was considered as part of the development of the draft WMMP. Targets were not proposed as this would be inconsistent with the recently updated NZ Waste Strategy. Under section 44 of the Waste Minimisation Act 2008, Councils must have regard to the Strategy when developing their Plans.

Officers recommend proceeding with these sections of the draft WMMP without amendment.

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### **3.2.4 Support for an outcome of “cleaner environs” and enlisting the community and/or beneficiaries to help**

Five submitters commented that the Plan should include improving the overall cleanliness of the environs around the Wellington region. This is not a specific goal or objective in the draft Plan.

Suggestions were made to enlist the help of community groups and/or beneficiaries to help with clean ups of places like beaches, parks and waterways.

Officers' response: The issue of clean environs is covered in general way under both the “goals & objectives” of the draft WMMP (“Minimising the harmful effects of waste wherever practical”) and the “outcomes” of the draft WMMP (“Clean street and public areas”). A number of Councils work locally, including with community groups, to actively clean up environs.

However, officers consider there is value in clarifying that these goals and outcomes cover the cleanliness of environs, by adding specific reference to this. Also, to support such a goal, officers recommend that an additional project be included in the Regional Action Plan to “Investigate a regional *clean up our environs* programme”. In making this proposal officers note that most of the projects proposed under the regional and individual actions plans will contribute to cleaner environs. Some Councils have specific projects in their action plans to achieve this, such as Project UH10. However, a specific regional project may identify activities that have not been picked up elsewhere and/or encourage coordination across projects to deliver a specific outcome.

Officers recommend adding specific reference to clean environs in both the goals & objectives and expected outcomes sections of the draft WMMP and a new project under the Regional Action Plan to investigate a regional ‘clean up our environs’ programme.

### **3.2.5 Other comments on generic issues**

The following are comments made by a submitter that relate to generic issues raised about the draft WMMP:

- a. review the Plan after three years, because things are changing rapidly
- b. the plan has a flaw in that it does not include commercial waste.  
Commercial sector needs to be held to account, and this is especially so if Councils expect residents to continue to support economic growth strategies
- c. the Plan needs an outcome that addresses the private sector specifically
- d. remove the reference to “highly” cost effective and “highly” efficient from the goals and outcomes sections as these can be used to argue against taking action or making investments
- e. the principle of encouraging private sector capability is not appropriate

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- f. the plan needs to be general enough to accommodate changes over six years, while still indicating intent and direction
- g. the plan needs to create incentives to reduce waste and increase recycling
- h. society needs to pursue steady state economics rather than growth economics – which is not sustainable and not compatible with reducing waste
- i. the environment is critical and the Plan needs to support it protection
- j. the Council needs to lead by reducing its own waste
- k. the statements for how funding will be provided look detailed but, in fact, cover almost all sources of income – they therefore do not add any transparency to how funding will be provided
- l. Councils have a conflict of interest between landfill revenues and reducing waste to landfill. It would be ethically corrupt to maintain waste volumes in order to keep up revenues

### Officers' responses:

- a. Councils have the ability to review the Plan at any stage if circumstances require. This is noted under section 1.6 of the draft WMMP.  
Recommendation: note comment, but no change to the draft WMMP.
- b. The draft WMMP does contain a number of proposals to specifically target the waste generated from the commercial sector. These include projects R7 (extended producer responsibility); R8 (investigate cleanfill licensing); and R11 (Investigate strategies to encourage industry in resource recovery). Given many of the issues are trans-boundary - that is unilateral action in the Wellington region may encourage flight of waste to other regions – and Councils have limited powers in respect of commercial waste streams, officers believe the approach to commercial waste proposed in the draft WMMP is appropriate. Recommendation: no change to draft WMMP.
- c. As noted by the submitter, there is no specific reference to outcomes related to private sector waste. However, such outcomes are clearly anticipated as a result of the actions under the draft WMMP. Officers therefore agree that such an outcome should be included in section 3.2 of the draft WMMP. Recommendation: add an expected outcome of “reduced waste and greater responsibility and focus on management of waste within the private sector”
- d. Officers disagree that the use of ‘highly’ in this context will lead to reduced investment or taking action. Rather, this describes an aspiration goal for waste services provided by Councils or the private sector. As such, officers believe it is appropriate in this context. Recommendation: no change to the draft WMMP.

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- e. Officers disagree that it is inappropriate to encourage the private sector's engagement in waste management. Given the amount of waste generated and handled by the private sector, and the ability for commercial incentives to drive waste reduction outcomes, officers believe encouraging private sector involvement is essential.  
Recommendation: no change to the draft WMMP.
- f. Officers agree with this comment, and consider that an appropriate balance has been struck. Officers also note that the potential "adjustments" to the regional action plan are anticipated and noted in the draft WMMP. This is important to provide some flexibility to respond to a changing environment without the time delays and expense of a full review of the WMMP. This issue is discussed later also.  
Recommendation: no change to draft WMMP.
- g. Officers agree and consider the draft WMMP does this appropriately.  
Recommendation: no change to the draft WMMP.
- h. This is outside the scope of the draft WMMP. Recommendation: no change to the draft WMMP.
- i. Officers agree and consider the draft WMMP does this appropriately.  
Recommendation: no change to the draft WMMP.
- j. A number of Councils have identified actions under their individual action plans that relate to Council's own waste reduction objectives (note KC11, UH17, HC16). Further discussion on this issue is provided under each Council's action plan, as appropriate.
- k. Officers agree that the funding statements are, to some extent, general. However, some degree of flexibility in funding is essential if Councils are to avoid having to make time consuming and costly reviews of the WMMP each time funding arrangements require some amendment.  
Recommendation: no change to the draft WMMP.
- l. Councils agree that there is a possible conflict between fiscal implications (especially income from landfills) and objectives for waste reduction. However, the Councils' proposed vision, goals, objectives and expected outcomes clearly indicate a commitment to achieve waste minimisation and improved environmental performance. While the comment is noted, officers recommend no change to the draft WMMP.

### 3.3 Feedback on the Regional Action Plan

The following section reports on feedback related to the actions proposed (or not proposed) to be undertaken collectively across the region. Some of the feedback also refers to the action plans of individual Councils. Where this is the case the comments may be repeated in both parts of this report.

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### **3.3.1 Support for recycling – refer to Projects R11 to R14**

11 submitters commented specifically in support of recycling initiatives. None opposed. Six submitters called for more recycling options to be available to residents. Suggestions for additional recycling services include:

- provide wheelie bins for recycling
- recycling needs to be better – it is being wind blown and causes a mess
- utilise local enterprises to increase recycling rates and processing, including the processing facility at Seaview
- provide recycling at supermarkets for collection of packaging
- implement public glass recycling
- offering more collection depots in communities – especially if kerbside collection is going to get more expensive

One submitter commented specifically in support of working with industry (project R11) noting that providing information alone is ineffective when seeking action from businesses.

One submitter noted that sorting recycling as close as possible to source (for example at or before kerbside collection) had a large effect on improving the quality and value of recyclable materials.

Many submitters supported recycling being extended/continued in schools. This is covered in the “Wellington City Action Plan” section of this report.

Officer’s response: The regional action plan includes a project to investigate a policy to provide consistent kerbside recycling collection (Project R13). Many of the comments noted above will provide useful input into that investigation, though specific changes to the project description are not considered necessary. Similarly, the comments regarding project R11 are noted and will be considered during the development of that project.

Regarding comments for more distributed recycling collection services, a number of Councils have identified actions under their individual action plans that relate to this issue. This is considered to be the appropriate part of the WMMP to consider this issue, in accordance with each Council’s circumstances. No further regional actions are therefore recommended.

### **3.3.2 Laws to require recycling (or prohibit landfilling of some materials) – refer projects R10 and R17**

Four submitters commented on the idea of regulating to exclude certain recyclable materials from landfills. Of those two supported the idea and two opposed it. One of the opposing submitters noted that previous attempts to regulate in this way had proven ineffective.

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Officer's response: The regional action plan includes a project (R10) to investigate landfill pricing signals / disincentives to discourage certain types of recyclable materials from being disposed of to landfill. Officers note that the comments by submitters are both for and against such measures. These are the issues that would need to be evaluated during the investigation proposed under the regional action plan. The comments are therefore useful input to that investigation though they do not require any changes to the draft WMMP.

### **3.3.3 Landfills fees / price signals– refer project R10**

3 submitters comment on increasing landfill / transfer station fees as a mechanism to encourage diversion of waste from landfills. One submitter supported the idea, while two were opposed. Those opposed noted that increasing fees would create incentives for illegal dumping of waste.

Officer's response: see comments under 3.3.2 above.

### **3.3.4 Overwhelming support for education on waste reduction – refer Project R9**

Ten submitters commented specifically in support of education of waste reduction. There were no opposing submissions. A number of submitters were organisations actively involved in waste reduction programmes. Some key comments from them are noted below.

In addition, 207 submitters supported recycling being provided to schools and/or early childhood education centres. While the vast majority of these submitters were commenting on projects covered by Wellington City's individual action plan, they can also be noted as being in general support of education on waste reduction. This is because many noted the important link between recycling services in schools and education of children, and through children their families, on waste reduction.

Specific comments on education activities include:

- The Paper-4-Trees programme directly supports many projects in the Plan – Councils are asked to collectively provide financial support to the programme. Half the schools in the region had a skip only before contact by Zero-waste. Now 88% of schools and 54% of pre-schools are in the programme. Maybe Councils could also contribute in a non-monetary way – like providing free plants to schools in the programme.
- The Zero-waste education programme assists in delivering projects R1, R4, R6 and R9 – Councils are asked to collectively provide financial support to this programme. The programme is comprehensive and works directly with schools to support programmes that contribute to the goals of the Plan.

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- Council should continue and increase support for Enviroschools. The programme offers multiple benefits. The existing supporting for the programme from Councils was acknowledged. One submitter considered that the regional Council needed to continue to support Enviroschools.
- Councils should publish monthly landfill figures to show people how waste reduction is going
- Councils should lobby Government for the national environmental education programme
- Education programme should include competitions and rewards
- Short-term information campaigns are ineffective – to be successful the programme needs to be a long-term process with sustainable (levy) funding

Officers' response: The feedback received either supports elements of the proposed education strategy that are already noted under Project R9 or are options or potential partners that should be evaluated as part of the development and implementation of the strategy. In particular, the role of schools in the education strategy will be a key issue, as will be potential partnerships and/or support for organisations already active in this area.

No changes to the draft WMMP are considered necessary. Officers will ensure that organisations that submitted on the WMMP (as well as other potential partners) are contacted and opportunities for their involvement in implementing the WMMP are explored.

### **3.3.5 Support for action on green / organic waste – refer project R12**

Seven submitters commented in support of Councils taking more action on organic / green waste. None opposed.

Four submitters supported the concept of a Council-provided kerbside collection service. One submitter proposed an entire organics collection and processing (composting) system. One submitter also noted that any initiatives on organics could be supported by targeting organic materials going to landfill – that is Councils putting measures in place to restrict or create incentives to keep organic material out of landfills (Officers note that this last point is discussed under 3.3.2 above).

One submitter noted that organic collections were costly and would require ongoing commitment from ratepayers to fund them if they were going to work.

Officers' response: Project R12 proposes that Councils investigate if there is a business case for organic waste collection systems. The support for such a service is noted however, a robust investigation of the costs and benefits of such an initiative is required. Officers therefore do not consider changes to the draft WMMP are necessary.

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### **3.3.6 Support for identifying uses for bio-solids / sewage sludge – refer Project R15**

Six submitters commented in support of projects to identify beneficial uses of bio-solids / sewage sludge. None opposed.

One submitter noted that there was an opportunity for a region-wide business to be developed based on recovery of nutrients from such material and that this could help reduce the agriculture sectors dependence on fossil-fuel based fertilizer. Three other submitters also supported the use of this material either as compost or as a source of bio-gas recovery. One submitter noted that the Crown Research Institute Scion in Rotorua was doing leading-edge research on recovery of bio-solids.

Officers' response: Project R15 proposes that Councils investigate options for beneficial use of sewage sludge. The support for such a project is noted, as are comments in support of particular options for the use of sludge. Wellington City has previously attempted to compost sludge with generally unsatisfactory results. Other Councils have different treatment methods. A project to further explore options for alternative uses, including assessing the costs and benefits of treatment, is considered essential. Officers therefore do not consider changes to the draft WMMP are necessary.

### **3.3.7 Support for grants for waste reduction activities – refer Project R6**

Four submitters support Councils providing grants for projects that reduce waste. None opposed the provision of grants. One submitter noted that grants were excellent when targeted toward small scale operations.

Officers' response: Support for Project R6 is noted. No changes are considered necessary to the draft WMMP.

### **3.3.8 Support for Product Stewardship initiatives / extended Producer Responsibility / Packaging controls – refer Project R7**

Eight submitters commented in support of greater responsibility by producers for the waste streams created by their activities. Packaging, agrichemicals and electronics were highlighted in particular. While no submitters opposed initiatives in this area one noted that it is best done by central Government but that the Government was unlikely to support such initiatives at this time. Two submitters noted that there was a natural synergy between these types of initiatives and Councils providing business grants – a sort of 'carrot and stick' approach to the issue.

One submitter noted that by taking collective action, the Councils should be able to increase their 'bargaining power' to regulate to have manufacturers take



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responsibility and plan for recycling of every product on supermarket shelves. A 'packaging tax' of 1% was proposed to fund recycling activities.

One submitter noted that extended producer responsibility was now the preferred approach rather the product stewardship. It was suggest that, given the national nature of such initiatives, Councils should work through LGNZ on them.

Officers' response: Support for Project R7 is noted. Submitters appear to agree that this is predominately an issue where the Councils should support action by central Government. Submitters' specific proposals are noted. These can be further considered as part of the preparation of submissions to Government. No changes are considered necessary to the draft WMMP.

### **3.3.9 Special or potentially hazardous wastes – refer Projects R14 and R16**

A small number of submitters made comments in respect of specific types of waste.

Two submitters commented of waste tyres, noting that all could be recycled and none should go to landfill. One submitter provided a detail submission (written and oral) on an energy recovery method that could process and market all waste tyres produced in New Zealand. Energy – for use in the cement industry – could be produced from waste tyres once processed. The cost of processing and collection was noted as being comparable or cheaper to costs of landfill. Another submitter noted the waste tyres could be recycled into tiles.

One submitter noted the importance of recycling automotive batteries since these provided a source of heavy metal contamination.

Two submitters supported projects to recycle polystyrene (Refer Project R14). One supported the provision of convenient collection points for waste polystyrene.

One submitter noted that a single collection day a year for electronic waste was not enough and that there needs to be a central place in the region to deal with this waste. Another commented that there needs to be more frequent and accessible options to dispose of e-waste and hazardous waste.

Officers' response: The feedback supports further work on specific types of waste that may be hazardous.

The submissions on tyres are noted, and further investigation of the business case for a region-wide approach to tyres should be investigated. This would allow submitters on this topic, as well as other relevant stakeholders, to be consulted further over options to address tyres. Recommendation: Officers

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recommend that Project R16 be amended to specifically provide for an investigation of a possible regional approach to the recycling or recovery of used tyres.

Similarly, officers note the comments on E-waste, and consider that a possible regional approach to such wastes should be investigated (while noting that treatment of E-waste remains an issue best addressed at a national level). Recommendation: Officers recommend that Project R16 be amended to specifically provide for an investigation of a possible regional approach to E-waste.

Other changes to the draft WMMP are not considered necessary.

### **3.3.10 Support for special collections**

Five submitters supported special collection days from time to time for [large] inorganic waste.

Officers' response: The provision of such services is a decision for each Council under its individual action plan, and in accordance with each Council's circumstances. No regional actions are therefore recommended.

### **3.3.11 Other issues raised on Regional Action Plan**

One submitter supported a regional Bylaw on waste (refer Project R1), but noted that the Councils needed to be mindful of any similar measures in neighbouring jurisdictions.

Officers' response: note support for this project. No amendment to the draft WMMP is necessary.

One submitter recommended that – when working with industry (refer Project R11) Councils should prioritise partner organisations that are committed and leading edge.

Officers' response: note the submission. No amendment to the draft WMMP is considered necessary.

One submitter supported second hand shops at landfills as a means of reusing material that would otherwise be sent to landfill.

Officers' response: note submission. Some Councils already have such operations. The appropriate place for further consideration of this issue is under individual Council action plans. No regional initiative is recommended.

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One submitter strongly supported the concept of licensing landfill operators (refer Project R8) noting that it is an excellent idea to address an area that has been widely abused.

Officers' response: note support for this project. No amendment to the draft WMMP is necessary.

Two submitters requested that wheelie bins be provided for rubbish.

Officers' response: note submission. The appropriate place for further consideration of this issue is under individual Council action plans. No regional initiative is recommended.

One submitter noted that, at the start of the Regional Action Plan it is noted that adjustments to the plan will be needed and that this is anticipated as a feature of the plan. The submitter noted that changes to WMMP must go through a process laid out in the Waste Minimisation Act 2008, which includes public consultation.

Officers' response: Officers note the submission and agree that the relevant legislation lays down specific requirements for reviewing Plans. However, the proposal is for adjustments (as opposed to a review of the Plan) to be able to be made from time to time. This is considered a pragmatic way of allowing some flexibility to adapt to changing circumstances with the considerable expense and time delays of a full review process. Recommendation: No change to draft WMMP.

### 3.4 Feedback on Individual Council Action Plans

#### 3.4.1 *Kapiti Coast District Council Action Plan*

Setting targets for waste reduction: One submitter (KCDC itself) submitted that the Council has formally adopted a Zero Waste to landfill goal and wishes to amend the action list to reflect that working towards this goal is an ongoing action.

Officers' response: The submission is noted.

Recommendation: The action of ongoing support towards the goal of zero waste to landfill will be added to the Kapiti Coast District Action Plan as action KC0.

Local disposal solutions: Two submitters noted that communities needed to take responsibility for their own waste issues rather than trucking waste elsewhere for disposal.

Officers' response: The Council has adopted a zero-waste policy for some years and has the policy that it would not invest in a new landfill site once the

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Otaihanga landfill reached the end of its life (2007). The rationale for this is that unless landfill charges can be used to provide a pricing incentive for waste reduction, the need to generate enough waste to pay for operating and development costs runs counter to waste reduction goals. Analysis to date shows this is not achievable given the proximity of other landfills in the region. The Council has made a commitment to explore regional options for waste disposal, including new technologies that avoid landfill solutions. Recommendation: no change to the draft WMMP.

### **3.4.2 Masterton, Carterton and South Wairarapa District Council Action Plan**

Rural waste issues: One submitter identified a number of specific issues regarding rural areas and waste. These include:

- the Councils should identify a new location for a landfill site
- there needs to be longer opening hours for rural people to access waste facilities
- increased costs of landfills and transfer stations encourages illegal dumping – something that is a problem in rural areas
- waste collections and recycling services need to be available in rural areas

Officers' response: Masterton District Council is planning to schedule an investigation into the viability of a local landfill site in its 20012/22 Long Term Plan.

A review of rural waste services in Masterton is planned during 2011/12 which will involve public consultation on the level of service to rural areas, the cost of services and who should pay for them including the option of a targeted rate.

Officers Recommendation: Add a bullet point to WAI28 as follows:  
Investigate the viability of a future local landfill site.

The rural review is covered by action WAI6 and no other changes are recommended.

Local disposal solutions: a small number of submitters noted that communities needed to take responsibility for their on waste issues rather than trucking waste elsewhere for disposal.

Officers' response: The work referred to immediately above directly addresses this issue also. No additional changes are recommended to the draft WMMP.

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### 3.4.3 Upper Hutt City Council Action Plan

Proposal to provide existing activities and service levels. Under the heading "Additional information" on the Upper Hut Action Plan, it is stated that "As at 2010 Council's existing waste minimisation and management activities exceed the levy funding it receives and Council's focus therefore is to maintain existing waste minimisation activities and levels of services". This may be confusing in that Council has also agreed to be part of the regional WMMP initiatives.

**Recommendation:** Amend the action plan by removing the sentence "As at 2010 Council's existing waste minimisation and management activities exceed the levy funding it receives and Council's focus therefore is to maintain existing waste minimisation activities and levels of services"

### 3.4.4 Porirua City Council Action Plan

All three submissions received supported the regional WMMP.

**Officers' response:** No changes are recommended to the Porirua City Action Plan.

### 3.4.5 Hutt City Council Action Plan

Proposal to Continue to Provide Existing Activities: Hutt City had in its Annual Plan Summary Questionnaire a generic question that asked residents for their views on the proposal that the Council continue its existing waste minimisation and management activities at the same levels of service:

394 submitters responded to this question.

347 submitters or 88% of those responding supported this proposal. Eighteen or 5% did not support the proposal, and 29 submitters did not know.

A total of 32 comments relating to the proposal that Council continue existing waste management and minimisation activities at the same levels of service were received, the largest majority of which (19) were requests for Council to do more than just continuing existing activities. A breakdown of comments is provided in the table below:

Questionnaire response: Council continue existing waste management and minimisation activities	Agree	Disagree	Not Stated
	22	6	4

Comments

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Want to see Council do more initiatives	16	2	1
Want to see improvement of, or changes to, present services	9	5	3
Want increased Council support for specific initiatives	9	0	0
Want Council to be more proactive	4	0	1
Want more incentives for waste minimisation	3	0	0
Against user pays	1	0	0

On doing more rather than continuing existing activities:

- One submitter noted that under the proposed Hutt City Action Plan, waste levy money would be used to support existing activities, and noted that this was a concern.
- The Ministry for the Environment has also written to Council expressing similar concerns that Council's policy will be to use waste levy funding to fund existing activities and that the Council's list of identified waste management and minimisation initiatives do not include any new activities.

Officers' response: Council's current proposal is to continue funding the same level of waste management and minimisation initiatives and as such its line of questioning in the Annual Plan Summary Questionnaire was not designed to gauge residents' opinion on any increase in activities. It is therefore difficult to determine the level of support for any increase in particularly waste minimisation activity. Officers note the majority of comments received were in support of Council doing more than its current waste management and minimisation activities.

Officers have written to the Ministry for the Environment and have emphasised:

- Council implemented an Environmental Sustainability Strategy in 2009 and that at that time it allocated additional resources including resources to waste minimisation.
- It is Council's understanding that Waste Levy funding is available to be used for both new and existing activities.
- While Council have not currently allocated any additional funding resource to waste minimisation, this does not exclude the Council from improving on existing services and trying new services within existing budgets.
- Council has also agreed to be part of the regional WMMP initiatives and that once in place these will in fact all be new initiatives

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- Officers have indicated that they will alter the wording on how Council will use waste levy funding and on new initiatives to better reflect the Council's policy.

Recommendation: amend the wording on how Council will use waste levy funding and on new initiatives to better reflect the Council's policy from:

*“as at 2010 Council's existing waste management and minimisation activities exceed the levy funding it receives and Council's focus therefore is to maintain existing waste minimisation activities and levels of service”*

to:

*“Hutt City Council adopted its first Environmental Sustainability in 2009 which included a number of waste management and minimisation initiatives -a number of which are now funded by the Waste Levy. Since that time Council's focus has been on maintaining and improving its levels of service within existing activities in the belief that within there is still room for improvement and that this is the best value for waste minimisation funds available. This does not however preclude Council from undertaking new initiatives within the same general activities identified above -as potential initiatives are researched and funding becomes available from Council or from efficiency gains or reprioritisation of existing budgets.*

Those wanting to see improvement of, or changes to, present services commented that:

- The present green bin recycling option did not work (with particular reference to their small size and the effect of wind dispersing contents on collection days (9)
- They wanted wheelie bins or other recycling/waste systems that they have observed in other locations (8)
- More recycling options (especially recycling centres) are needed (5)
- There should be better and more frequent reporting in the media of the city's waste volumes (2)
- The green waste collected at the landfill should be composted (1)
- Council should use local enterprise more in waste initiatives (1)
- Council's rubbish bags are got at by animals and it makes a mess (1)

Officers' response: The majority of comments refer to how existing services are provided. These services are contracted out on a three-five year basis. Officers maintain a keen interest in the various waste and recycling options being used by Council's in New Zealand including the recent changes in Wellington City to a Wheelie bin recycling system.

As part of that process different service options are assessed and weighed up in terms of effectiveness, price, and suitability for our geographic location.

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Based on these parameters Council endeavours to select the best solution for residents at the time the contract is awarded.

Recommendation: no change to the draft WMMP is necessary at this time.

Specific initiatives commented on, where increased Council support was requested included:

- Earthlink and Landfill recycling (6)
- Community Recycling Stations (3)
- Inorganic collections (3)
- Community Projects/ Initiatives (2)

Earthlink also provided an oral requesting continued support of their activities. Until 2010 Earthlink has provided the majority of its services to the Hutt Valley with very limited funding from the Council's. Earthlink spoke in support of the Action Plan they have drafted with Hutt City Council to provide more recycling services at the Silverstream landfill and directly to local residents and businesses.

Officers' response: Council has recently completed an Action Plan with Earthlink to increase the volume and effectiveness of its recycling services and to identify other waste minimisation opportunities. Following the completion and adoption of this document it is the Council's intention to negotiate a three year funding agreement for services as identified in the Action Plan Document.

Recommendation: no change to the draft WMMP is necessary at this time.

### **3.4.6 Wellington City Council Action Plan**

Nappy composting: One submitter noted that Wellington City should have a nappy composting scheme like Porirua City's Project PC 14.

Officer Comment: A private organisation recently sought and won funding from the Waste Minimisation Levy to conduct a feasibility study for the establishment of a nappy collection and composting facility in the Wellington region. The study findings, announced by the Minister for the Environment, identified that such a service could be feasible if a suitable site could be found and if users were prepared to pay a fee for service. Based on these findings, the private interest is in discussions regarding a potential site in the region.

The Plan recognises that organic waste collection systems are an option (Project R12) for further analysis. Officers consider that Project R12 and the initiative already underway adequately cover nappy composting and that there is no requirement to amend the draft.



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### Overwhelming support for Recycling in Schools and Early Childhood Centres (Refer Project WC12):

207 submitters supported (and many strongly supported) the extension and/or continuation of Council provided recycling to schools and early childhood centres. Submitters noted the critical role schools can play to instil waste minimisation attitudes and behaviours from a young age. Once established, such behaviours can transfer to home, and a number of examples of this were provided in both written and oral submissions. Many submitters noted that schools – with a Council supported recycling service – could and are playing an important partnership role in waste minimisation education activities. Many submitters supported specific initiatives such as Paper-4-Trees, Enviroschools, and the Zero-waste education programme.

Officers response: The proposed Project WC12 recommends an investigation of the costs and benefits of expanding recycling collection services to schools.

In light of the public feedback on this issue, officers initiated an immediate trial on recycling from schools. Officers also investigated costs for delivering a service that would meet the majority of schools' recycling needs, at a reasonable cost and with appropriate safety considerations. Wellington City has initiated a mechanism to fund / subsidise recycling of paper in primary schools and early education centres. Officers recommend that Project WC12 be amended to reflect this new initiative.

### Support for recycling for non-profit community organisation (refer Project WC11):

Officers' response: In light of the level of support for this suggestion - including that support noted through the Council's call centre during the rollout of the new recycling system - officers investigated whether the new suburban recycling system could be extended to non-profit community organisations. This proved positive and a mechanism is now available for non-profit organisations to apply, in certain circumstances, for Council-provided kerbside recycling services. Officers recommend that Project WC11 be amended to reflect this new service.

### Council needs to work with apartment building owners on waste and recycling collections:

Officer Comment: Officers agree that this is an area requiring attention if the region is to meet waste minimisation objectives. The Regional Action Plan (Project R11) explicitly identifies 'advice for multi-unit tenancies and commercial buildings' as a strategy to be investigated to encourage industry involvement in resource recovery. Officers consider that this area is adequately addressed and that there is no requirement to amend the draft WMMP.

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Apparent advocating for small landfills: One submitter interpreted Project WC6 as advocating for small landfills. The submitter noted that this was not consistent with global trends or best practice for landfills which tend to be larger, with higher environmental standards.

Officers' response: Officers believe this is a misunderstanding. The Project WC6 suggests advocating for higher national waste levies, with money raised distributed to those communities paying the levy – that is territorial authorities. Levy monies are distributed based on population, not which Council operates a landfill. Therefore the proposal would not create incentives for Councils to open new, small landfills in order to access levy monies. Officers' recommendation: no change required to draft WMMP.

Improving performance of cleanfill operators: One submitter commented that, in respect of Project WC7, Councils probably had adequate legislative powers to deal with landfill operators, but it was up to local authorities to use them. The submitter supported the idea of licensing.

Officers' response: Enforcing existing consent conditions as provided under the Resource Management Act has proved difficult when dealing with cleanfills in Wellington City. Officers do not feel that there are adequate legislative powers and concur that licensing is necessary. Officers' recommendation: no change necessary to the draft WMMP.

Internal waste minimisation: a small number of submitters commented that Councils should show leadership on waste minimisation by reducing their own waste.

Officers' response: Officers agree that the Council can lead by example. While there are a number of waste minimisation activities underway within the Council, these could be publicly demonstrated and given a higher profile than at present. Officers' recommendation: that a new action 'Demonstrate Council leadership' be added to the draft WMMP.

Special collection days for [large] inorganic waste: A number of submitters commented generically in support for such services.

Officers' response: Officers do not agree that 'free' inorganic collections are consistent with residents taking responsibility for their own waste. In other cities inorganic collections have become unwieldy and difficult to manage, and officers consider that there are adequate systems and resources for people to dispose, reuse or recycle inorganic waste without the Wellington City Council taking responsibility. The current system of 'Community Cleanups' is an adequate model. These cleanups are lead by communities with Council

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support, not the other way around. Officers' recommendation: no change to the draft WMMP.



## **APPENDIX 3**

### **Councils of the Wellington Region Draft Waste Management and Minimisation Plan 2011 - 2017**