

**SUBMISSION  
NUMBER**

**145**

**Sharon Bennett**

**From:** mgtaylor@kol.co.nz  
**Sent:** Friday, 3 June 2011 1:20 p.m.  
**To:** BUS: Policy Submission  
**Subject:** Draft Waste Management & Minimisation Plan

The following details have been submitted from the Draft Waste Management & Minimisation Plan form on the [www.Wellington.govt.nz](http://www.Wellington.govt.nz) website:

**First Name:** Michael  
**Last Name:** Taylor  
**Street Address:** 10 Laurent Place  
**Suburb:** Kingston  
**City:** Wellington  
**Phone:** 3898071  
**Email:** mgtaylor@kol.co.nz

I would like to make an oral submission: Yes

I am making this submission: as an individual

Do you agree or disagree that Wellington City Council should participate in regional waste minimisation initiatives: Agree

Do you have any comments on this Regional Action Plan: This outline is very generalised and could equally easily lead to bad as good outcomes. I shall email through my detailed comments on this as part of my complete submission on the Draft WMMP as a .PDF file.

Do you have any comments on the actions proposed for the Council: Nearly all items seem desirable but the likely level of success of each is much harder to judge. I shall email through my detailed comments on this as part of my complete submission on the Draft WMMP as a .PDF file.

Do you have any comments on vision, goals, objectives and guiding principles of the draft plan: It is unclear to what element of the draft WMMP this refers. As earlier questions refer to parts B & C one would expect this to refer to something later in the plan, however, nothing in WCC's actions or the appendices matches. I guess that this question relates to the earlier Part A's "VISION, OBJECTIVES, POLICIES AND OUTCOMES" but I'm uncertain just which 3.x are included and which excluded by "vision, goals, objectives and guiding principles " so refer you to my my detailed comments potentially all 3.x which are part of my complete submission on the Draft WMMP as a .PDF file - to be emailed

201

Do you have any other comments: The intention seems to be good. However, the assessment on which it was, at least partly, based is flawed; councils have inadequate powers; and the plan needs to be more specific, clearer and stronger to succeed.  
I shall email through my detailed comments on the Draft WMMP as a .PDF file.

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## Sharon Bennett

**From:** Michael Taylor [mgtaylor@kol.co.nz]  
**Sent:** Monday, 6 June 2011 5:12 a.m.  
**To:** BUS: Policy Submission  
**Subject:** Submission on Draft Waste Management and Minimisation Plan  
**Attachments:** Attachment information; WasteManagementPlan201106.pdf

I made a brief online submission on the Draft Waste Management and Minimisation Plan in which I said I'd provide a more detailed submission via email. The attached .PDF file is that submission (and includes a copy of the online submission). If there is any problem reading that file please contact me (Telephone 3898071 or email) and I can supply in some other form.

I have asked to be heard by Council in support of my submission.

Many thanks,  
Michael Taylor

8/06/2011

Planning Policy,  
WCC, 101 Wakefield St  
email: policy.submission@wcc.govt.nz

10 Laurent Place  
Kingston  
1st June 2009  
tel 043898071  
email: mgtaylor@kol.co.nz

### Draft Waste Management and Minimisation Plan

Dear Councillors ,

I make my submission below on this draft plan as a Wellington resident and ratepayer of nearly thirty years. I have read the plan <http://www.wellington.govt.nz/haveyoursay/publicinput/pdfs/2011-05waste-plan.pdf> and looked at the supporting documents including the "Wellington Regional Waste Assessment, March 2011". I started to fill in the online submission form but then decided that a "written" free form submission rather than a form one would be more appropriate. This PDF is that submission and includes a copy of the online submission at its end. In this submission I refer to the "Draft Waste Management and Minimisation Plan" as the "Plan", except where context implies reference to the final approved plan developed from that. As issues are interrelated and the Plan is somewhat repetitive, I request my comments and requested changes be taken to refer to all occurrences of the issues and include consequent changes. I wish to be heard in support of my submission and ask to be contacted (Tel 3898071) so that can be arranged.

Yours faithfully,

Michael Taylor

## Overall comments

- (a) I support waste minimisation and in principle having a WMMP and indeed one that applies across multiple Wellington territorial authorities.
- (b) Level and form of descriptions

The Plan seems very generalised, quite repetitive and, while apparently detailed, its structure and terminology may obscure the actual detail. As such I feel it does not inform the people (or businesses) of the region just what is intended and expected. I also fear it could be interpreted significantly differently by different parties. As examples:

  - (1) The Plan uses the definitions from the Act for terms like recycling, reduction, reuse and waste. Those are, almost inevitably, complex and hard to grasp fully. They include subtleties which are confusing and unimportant to most readers. A “technical reader” would surely expect to refer to the Act when needing those details. Indeed such a reader would have to do so as, without including the full set (heaven forbid), the Plan itself is incomplete. For example its definition of recycling includes both “waste” and “diverted material” so making it clear these terms differ, but it only gives the definition of the former. However, anyone to whom the precise definition of “waste” (80 or so words !) is important would surely be likely to need the definition of “diverted material” (30 or so words). If it is felt necessary to use terms whose meanings have to be supplied in the Plan I suggest those meanings be worded more simply.
  - (2) Part 6 of the Strategy (“Means of implementation and funding”) says Appendix C outlines how funding is proposed, yet on referring to that one finds WCC has listed five, which comprise most, if not all, methods a Council can use for any funding, and does not actually exclude using others. So what at first appears to be provision of detail, turns out to carry little if any useful information.
- (c) The plan appears to have no quantitative targets such as proportion or per person amounts of recycled material or other similarly measurable results. I am concerned that the Plan could be used by some councils simply to go through the motions and “feel good” while carrying on with “business as usual” rather than take up the challenge actually to do better.

## Part A specific points

- (d) Executive Summary (fourth bullet page 6)

I note that rather than our territorial authorities making the required waste assessment collaboratively themselves, they have had a third party, Morrison Low, make that assessment. Passing Council work to the private sector not only sets a bad precedent as a start to our councils working together in this area but also has detracted from the value of the assessment (see my (e)).
- (e) Executive Summary: waste assessment was undertaken during 2010 (Page 7)

I have looked through this and am alarmed that it was done by the private sector and not by the Councils together. I see obvious errors and omissions which would seem unlikely to have been made had the Councils themselves produced the assessment. For example:

  - (1) Table 4.8-1 on page 39: says that WCC's new recycling scheme accepts only “*plastics 1-2*”, whereas the scheme accepts *all plastics except polystyrene*. The table clearly relates to the new WCC scheme, not the old one, as it specifies crates for glass and bins for other

materials. **The amount of recycling will obviously be higher as it is of all plastics (except polystyrene)**, not just “plastics 1-2” and so Morrison Low's report will be inaccurate.

(2) Although “Trash Palace” is mentioned no fewer than four times, “Second Treasure”, WCC's equivalent, which plays a significant part in the second most important aspect of the Plan (reuse), is not mentioned at all.

(3) Table 4.8-1 on page 39: **states “90 litre bags where bins unsuitable”, but the bags are 70 litres.** That's well documented, for example Part 9 2.1.e of WCC's own bylaw for Waste Management explicitly states “*A 70 litre clear plastic bag* branded with the Wellington City Council logo and printed with the following “official suburban recycling bag” must be used and earlier officers' reports to SPC specified that size.

**Given Morrison Low have an error of nearly 30% in such a simple figure how can councils or ratepayers have any confidence in the many other figures in their report which require far more complex measurements and calculations ?**

(f) 1.1 first bullet (page 10) & Executive Summary first bullet (page 6)

I fully agree with the waste hierarchy – “reduction, reuse, recycling, recovery, treatment and disposal (in descending order of importance)”. However, the Plan has comparatively little practical action for the two most important aspects: reduction (using less material in the first place) and reuse (using “waste” material for the same or similar purpose without reprocessing it).

(g) 3.2 Goals, objectives and expected outcomes (Page 23)

Including “highly cost effective council and/or privately provided” in the qualification of the second (bullet point) objective of “Achieving effective and efficient waste management” is unnecessary and imposes an over restrictive constraint. By setting the standard too high and a too easy excuse is provided for not achieving the objective. I ask that that be deleted **to simplify the point to “Achieving effective and efficient waste management through cost effective waste management services”**. If that is not done then at least delete “highly”. For the same reason and consistency I ask that “highly” be deleted from the fifth (bullet point) outcome.

**I also ask that the fourth (bullet point) objective be extended by adding “or avoiding resource use”**. That reflects the most important method i.e. reduction.

(h) 3.2 Goals, objectives and expected outcomes (Page 23)

Given that reduction is the most important method, coming before all others including reuse, the second bullet outcome should be “**an increased proportion of waste diverted** through reuse and recycling” rather than “**increased volumes of waste diverted** through reuse and recycling”.

(i) 3.5.2 Stewardship (Page 24)

I strongly support the statements here. I ask that, consistent with the vision and objectives and recognising the waste hierarchy, “managing all wastes” be replaced by “**minimising and managing all wastes**”.

(j) Principles 3.5.2 to 3.5.8 inclusive (page 25)

I strongly support these principles.

(k) Principle 3.5.9 (page 25)

The private sector's objective and motivation is typically private profit, not public or environmental good. Whether the private sector is capable or willing to contribute to waste minimisation and management is a matter of debate. While it is appropriate for there to be a principle to encourage, and indeed require, the private sector to minimise and manage its own waste, the wording (e.g. "encouraging the private sector's capability and opportunities") goes beyond that and I ask this principle be reworded accordingly.

(l) Principle 3.5.10 (page 26) & Executive Summary (page 6)

These identify a serious issue - "the councils recognise that they do not control much of the waste stream in the region, since large volumes of waste are produced and managed by the private sector". The draft WWMP is not strong enough on this. The Act (Section 43(2)) sets the geographical scope of a WWMP to "within the territorial authority's district" and it covers activities "whether provided by the territorial authority or otherwise". Thus to be successful the Plan must explain how it will regulate the private sector to ensure the Plan's objectives and policies are not thwarted by the private sector (e.g. by them not encouraging or possibly requiring the separation of recyclable materials). Even if councils are uncertain just how that will be done it should at least be recorded as under "key issues and challenges".

I do accept the pragmatism that "it [landfill] remains necessary for the foreseeable future."

(m) 4. Monitoring and reporting progress (pages 27-29)

**It is unsatisfactory that no specific quantifiable targets are set here.**

I ask that where the Plan proposes "Progress Reported" to be "Annual report" it be changed to **"Quarterly and Annual report"** (at least for those council's that issue a quarterly report as WCC does). For measurements that are (annual) "satisfaction surveys" that would obviously mean in the first quarterly report following the survey and not each quarterly report.

(n) 4. Monitoring and reporting progress (pages 27-29)

I accept that it is impossible to get really good measurements of some aspects of waste minimisation (some actions may be taken by the consumer and not be measurable by councils even with if suppliers provide consumption data). However, the "Measurement of quantity of waste and diverted materials", as appearing in the table here, can and should be broken down to distinguish between reusing and recycling.

(o) 5. Actions for the future (page 30)

The Act clearly places great importance on public consultation, requiring it to use the special consultative procedure set out in section 83 of the LGA2002, even where the outcome from an assessment is a proposal for no change. Nevertheless I agree it may generally not be necessary and may be an unjustifiable overhead to "review the overall plan" when proposing "making adjustments to policies or to the various actions being proposed either under the regional or individual action plans". However, it would make a nonsense of consulting the public on policies and action plans in the first place, if these could be changed arbitrarily without public consultation and that is what the "Making such changes and adjustments is anticipated as a feature of this plan" effectively means. **I ask that at a minimum the Plan should require any proposed change to policies be subject to public consultation and require that councils must determine by resolution on each occasion whether a proposed change to an action plans should be subject to public consultation.**

### **Part B & C (Action Plans) specific points**

- (p) R4 Improved data collection:  
Consideration should be given as to whether some physical measurement of overall consumption can be achieved. This would be useful in that consumption and its ratio to waste and to diverted material are measures of the success of the methods in the hierarchy of waste minimisation.
- (q) R7 & WC5 Enhance packaging design controls and EPR for packaging materials  
Packaging is a major factor in creating unnecessary waste and I strongly support councils lobbying (central) Government to put effective regulations in place. Otherwise councils end up having to deal with the resultant problems.
- (r) R9 & WC1 Development of a Regional Waste Education Strategy & Working with Schools  
I strongly support the use of education to achieve waste minimisation. Not only are school pupils future householders, consumers and “waste generators” but also they can influence their parents' actions and attitude toward waste minimisation. Getting the right environmental messages into schools provides critical leverage for now and the future. Entirely the wrong message has been sent by the termination of collecting recycling from several schools resulting from the recent total privatisation of WCC's kerbside recycling scheme.



### **Additional points**

- (s) There are a number of waste minimisation measures which I have not seen in the Plan and believe would be useful. It may be that for some of these (central) government denies territorial authorities the necessary authority and in that case the Plan should be to lobby government either to itself act or to provide authority to territorial authorities.
  - (1) Require a refundable deposit be paid for glass bottles. Voluntary schemes (e.g. “swap a crate”) show this can work.
  - (2) Require supermarkets to have a marked bin at checkouts where customers can leave unwanted packaging from their purchases. Supermarkets might then pressurise suppliers to reduce unnecessary packaging. This also encourages separation closer to source.
  - (3) Require supermarkets (over some size) to provide and service recycling bins or at least provide space for council serviced bins. This is consistent with A.3.5.4 as it puts costs closer their source.
  - (4) There seem to be no measures that reflect the correlation between GDP growth and changes in “waste to landfill” (Page 18 of the assessment). This basically suggests that increasing consumption is a cause of increasing waste. Part of the problem is the modern trend to buy lower quality and discard rather than buy higher quality and retain. The effect of the modern attitude toward repairing goods has a similar effect.
  - (5) WCC should look to develop its equivalent of PC14 (Support alternatives to disposable nappies). This one product produces a disproportionate amount of waste.
  - (6) Penalise commercial operators who do not separate recyclable material
- (t) Potential confusion regarding plastic recycling codes:

In the Plan, WC12 states that WCC's new recycling system will extend plastics recycling to include types 1-7, yet it is my understanding that the (SPI) code of 6 designates polystyrene which is specifically excluded from the WCC system.

### **Minor points**

- (u) Executive Summary (fourth bullet point page 6)

While Section 51 of the Act specifies the requirements of a waste assessment, it is Section 50(2) that requires “the territorial authority must make an assessment”. So whereas the statement “.... undertake a waste assessment under section 51..” (page 7) is right, it seems this bullet point, “... as a requirement of section 51 ...”, should refer to Section 50 and I ask the wording be changed to reflect that ( i.e. it become “... undertaken by a council as a requirement of section 50 ...”).
- (v) Part C Action Plan for Wellington City Council

It looks like the twelfth Action has been labelled IWC12 rather than WC12.

## Copy of online submission

### Your Details

First Name: Michael  
Last Name: Taylor  
Street Address: 10 Laurent Place  
Suburb: Kingston  
City: Wellington  
Phone: 3898071  
Email: mgtaylor@kol.co.nz

I would like to make an oral submission: Yes

I am making this submission: as an individual

Do you agree or disagree that Wellington City Council should participate in regional waste minimisation initiatives: Agree

Do you have any comments on this Regional Action Plan: This outline is very generalised and could equally easily lead to bad as good outcomes. I shall email through my detailed comments on this as part of my complete submission on the Draft WMMP as a .PDF file.

Do you have any comments on the actions proposed for the Council: Nearly all items seem desirable but the likely level of success of each is much harder to judge. I shall email through my detailed comments on this as part of my complete submission on the Draft WMMP as a .PDF file.

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## Draft Regional Waste Management and Minimisation Plan 2011-2017 (WMMP)

Wellington City Council is working with other Councils in the region to collectively promote effective and efficient waste management and minimisation. This work is outlined in the draft regional Waste Management and Minimisation Plan (WMMP).

To have your say on the draft plan fill out this form and send it to one of the addresses listed below.

### Your details

Mr ☒ Mrs ☐ Ms ☐ Miss ☐ Dr ☐ (circle which applies)

First name/last name\* Raewyn Berkahn (Manager: Box Hill Kids)

Street address\* 35 Box Hill, Khandallah, Wellington

Phone/mobile 021 2452677

Email raewyn@onslowanglicans.org.nz

\* Mandatory fields

I am making a submission

☐ As an individual

☒ On behalf of an organisation

Name of organisation

Box Hill Kids

I would like to make an oral submission to Councillors

☒ Yes

☐ No

If yes, provide a phone number above so that a submission time can be arranged.

(021) 2452677

(04) 4793520

Submissions close 5pm Friday 3 June 2010

### Privacy statement

All submissions (including name and contact details) are published and made available to elected members of the Council and the public. Personal information supplied will be used for the administration and reporting back to elected members of the Council and the public as part of the consultation process. All information collected will be held by the Wellington City Council, 101 Wakefield Street, Wellington. Submitters have the right to access and correct personal information.

### Have your say

1. Do you agree or disagree that Wellington City Council should participate in regional waste minimisation initiatives?

☒ Agree

☐ Disagree

☐ Don't know

### Action Plans

2. Part B of the draft plan outlines a Regional Action Plan – this proposes the key regional objectives and actions the councils will undertake collectively.

Do you have any comments on this Regional Action Plan?

We agree with the Councils' expected outcomes,  
particular:

\* "reduced volumes of waste disposed to landfill"

\* "increased volumes of waste diverted through reuse and recycling"

\* "Communities that are well informed about the effects of waste and the opportunities they have to reduce waste."

3. Part C of the draft plan outlines the actions proposed to be undertaken by Wellington City Council itself.

Do you have any comments on the actions proposed?

We think that Early Childhood Centres should be included  
with schools in WC1 and WC13. If children are  
well grounded in environmental education BEFORE they  
go to school they are more likely to grow up "well  
informed about the effects of waste and the opportunities  
they have to reduce waste."

## Vision, objectives and guiding principles

4. Section 3 outlines the vision, goals, objectives and guiding principles of the draft WMMP.

Do you have any comments on these aspects of the draft plan?

We endorse the Vision, Goals, Objectives and Guiding Principles of the draft ~~WMMP~~ WMMP. We see Early Childhood Centres <sup>playing</sup> as an initial and crucial role in the outworking of these.

## Other comments

5. Do you have any other comments on the draft WMMP?

We are committed to recycling and believe that the Wellington City Councils should promote sustainable practices such as recycling amongst its youngest citizens. PLEASE GIVE US SOME RECYCLING WHEELIBINS SO WE CAN CONTINUE THE WORK WE BEGAN IN 2006.

P.S. Attached to this submission is artwork by the children regarding the importance of recycling.

This form can be submitted:

by email to:

policy.submission@wcc.govt.nz

by letter to:

Wellington City Council

PO Box 2199

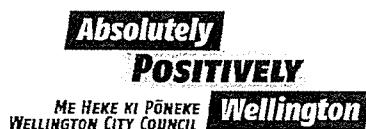
Wellington 6140

Attention: Sharon Bennett

by fax to:

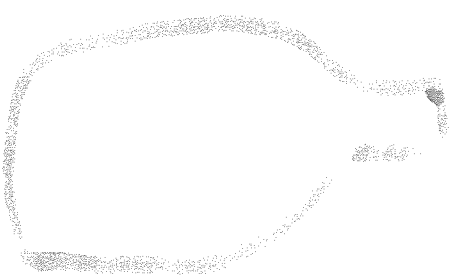
(04) 801 3231

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Freepost 2199  
Policy and Planning (COP001)  
Wellington City Council  
PO Box 2199  
Wellington 6140

Recycle

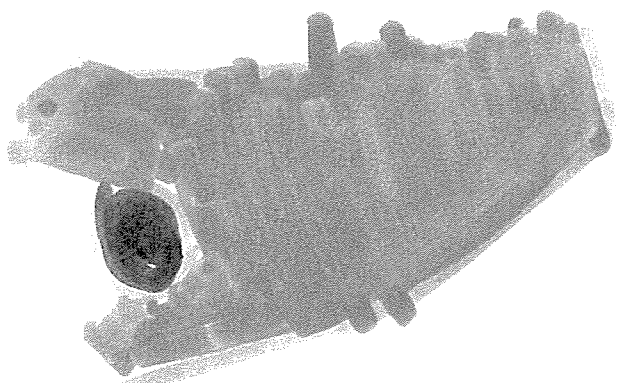


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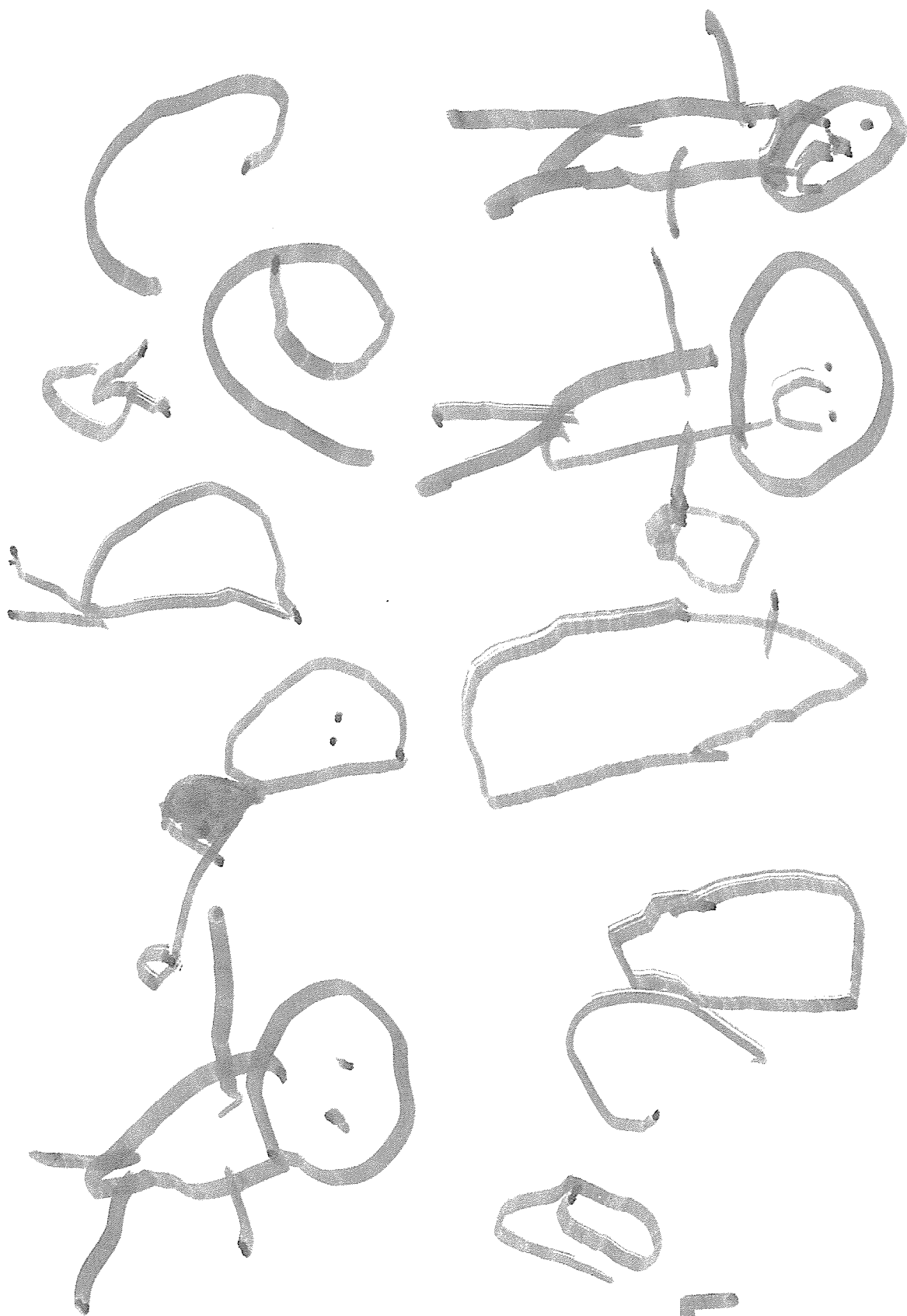
George

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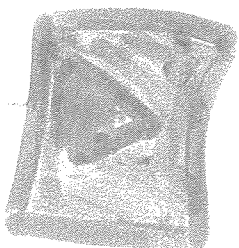
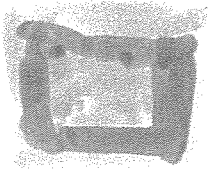


Evann

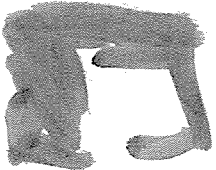
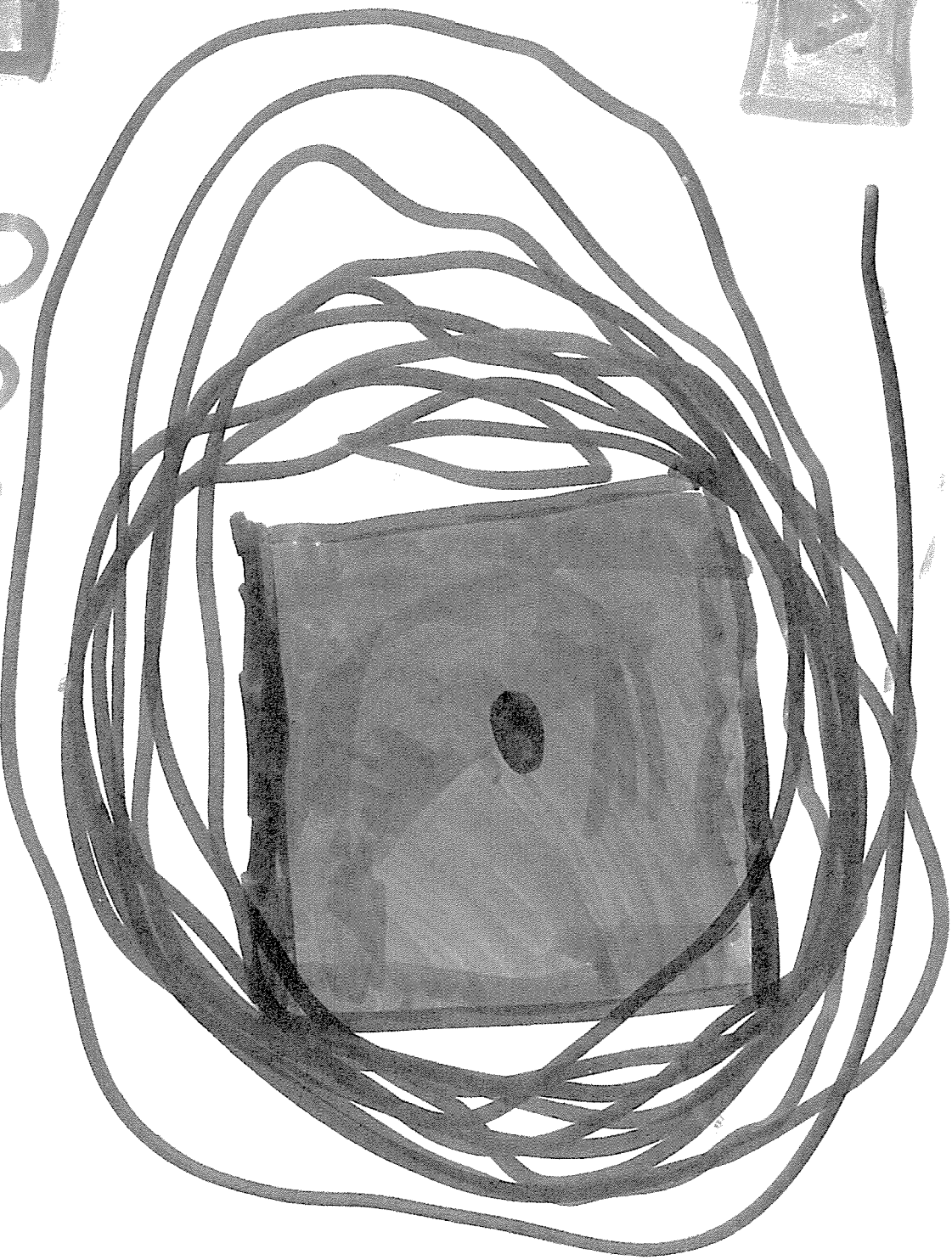
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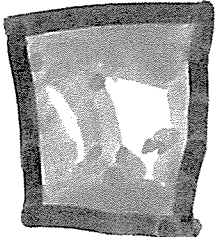




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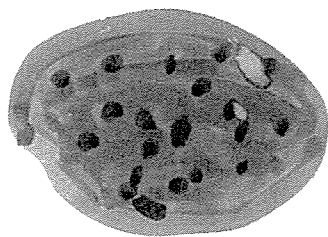
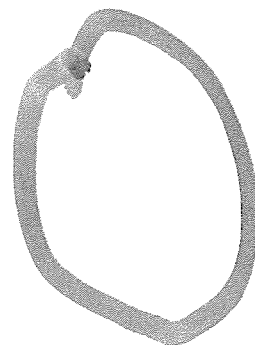
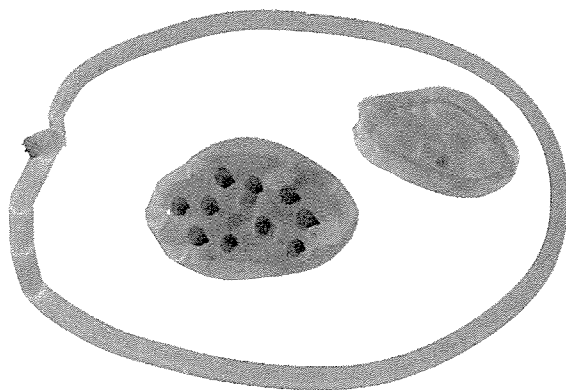
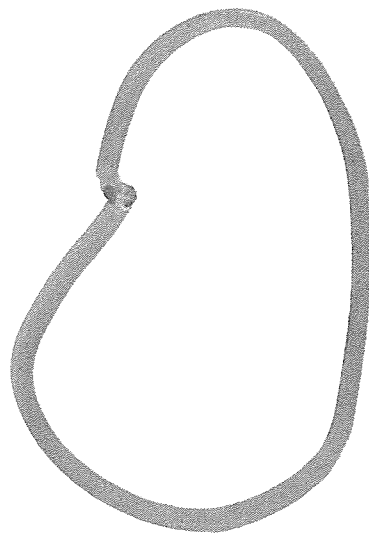
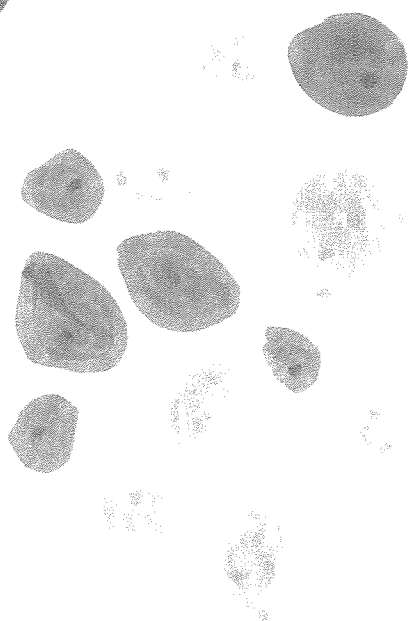
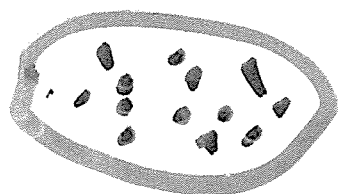
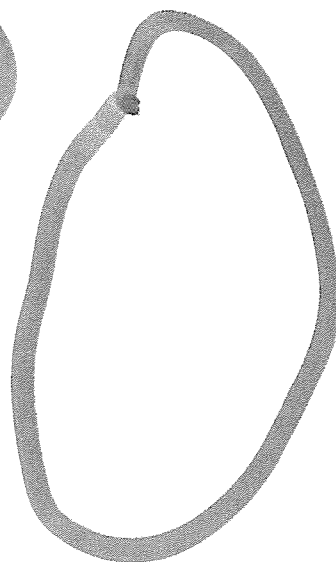
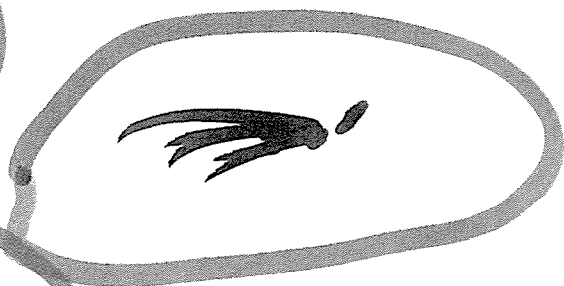
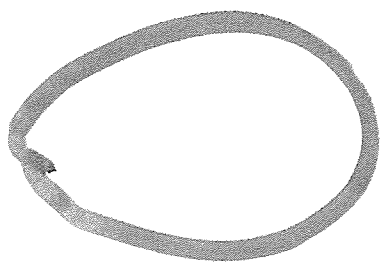
Recycle





Tom











Amelie



**Sharon Bennett**

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**From:** seatoun@wn-kindergarten.org.nz  
**Sent:** Wednesday, 1 June 2011 1:39 p.m.  
**To:** BUS: Policy Submission  
**Subject:** Draft Waste Management & Minimisation Plan

The following details have been submitted from the Draft Waste Management & Minimisation Plan form on the [www.Wellington.govt.nz](http://www.Wellington.govt.nz) website:

First Name: Anne

Last Name: Stevens

Street Address: 14 Gore ST

Suburb: Seatoun

City: Wellington

Phone: 043808933

Email: seatoun@wn-kindergarten.org.nz

I would like to make an oral submission: Yes

I am making this submission: on behalf of an organisation

Organisation Name: Seatoun Kindergarten

Do you agree or disagree that Wellington City Council should participate in regional waste minimisation initiatives: Agree

Do you have any other comments: it is vital that recycling collection is extened to all schools and kindergartens in Wellington

51

**Sharon Bennett**

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**From:** Donna Sherlock  
**Sent:** Thursday, 26 May 2011 10:28 a.m.  
**To:** Meagan Miller  
**Subject:** FW: Please send us more info about the submission process

**Donna Sherlock**

**Waste Minimisation and Education Manager**  
**Wellington City Council**  
**ddi: 04-383-4439**  
**mob: 021-227 8625**

*It is not the strongest of species that survives, nor the most intelligent, but the one most responsive to change. (Charles Darwin)*

---

**From:** support.Seatoun Kindergarten [mailto:seatoun@wn-kindergarten.org.nz]  
**Sent:** Wednesday, 25 May 2011 17:31  
**To:** Donna Sherlock  
**Subject:** Please send us more info about the submission process

Hi Donna,

It would be very helpful if you could give us some more information regarding the submission process as we would really like the recycling service to continue due to the learning involved for our children.  
How detailed does each submission need to be ?  
Do you accept submissions from children (4yrs olds) ?  
Do they need to be written or can we send in pictures ?

I look forward to hearing from you

Anne Stevens

Seatoun Kindergarten  
14 Gore Street  
Seatoun  
Wellington  
T: 04 380 8933

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*Any views expressed in this message are those of the individual sender, except where the sender expressly, and with authority, states them to be the views of Wellington Kindergartens.*

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2/06/2011



**Sharon Bennett**

**SUBMISSION  
NUMBER**

**136**

**From:** Carbon Recovery [sales@carbonrecovery.co.nz]  
**Sent:** Friday, 3 June 2011 6:07 a.m.  
**To:** BUS: Policy Submission  
**Subject:** Submission to Regional Waste Management and Minimisation Plan  
**Attachments:** Draft Regional Waste Management and Minimisation Plan 2011.docx; 11967  
CarbonRecovery A4 Brochure.pdf

Please accept our submission to the Waste Management and Minimisation Plan

We would like to speak to the submission.

**Owen Douglas**  
**Director and Manager for**  
Carbon Recovery Ltd  
18 Taratoa Street, Tauranga 3112 | New Zealand  
Tel: 64+7+578 3935 | Fax: 64+7+571 2521 | Freephone 0800 868 473  
[sales@carbonrecovery.co.nz](mailto:sales@carbonrecovery.co.nz) | [www.carbonrecovery.co.nz](http://www.carbonrecovery.co.nz)

3/06/2011

## Draft Regional Waste Management and Minimisation Plan 2011 -2017 (WMMP)

### Submission:

Wellington City Council is working with other Councils in the region to collectively promote effective and efficient waste management and minimisation. This work is outlined in the draft regional Waste Management and Minimisation Plan (WMMP). To have your say on the draft plan fill out this form and send it to one of the addresses listed below.

### Your details

☒ Mr / Mrs / Ms / Miss / Dr (circle which applies)

First name/last name\* - Owen M Douglas

Street address\* -18 Taratoa Street Tauranga 3112

Phone/mobile 07 578 3935 or 0800 868 473

- Mandatory fields

I am making a submission

As an individual ☐ On behalf of an organization ☒

I would like to make an oral submission to Councillors - ☒ Yes

Email – [Info@carbonrecovery.co.nz](mailto:Info@carbonrecovery.co.nz)

Name of organisation – Carbon Recovery Ltd Tyre Recycling ☒ Yes ☐ No

If yes, provide a phone number above so that a submission time can be arranged.

Submissions close 5pm Friday 3 June 2010

### Privacy statement

All submissions (including name and contact details) are published and made available to elected members of the Council and the public. Personal information supplied will be used for the administration and reporting back to elected members of the Council and the public as part of the consultation process. All information collected will be held by the Wellington City Council, 101 Wakefield Street, Wellington. Submitters have the right to access and correct personal information.

1. Do you agree or disagree that Wellington City Council should participate in regional waste minimisation initiatives?

☒ Agree ☐ Disagree ☐ Don't know

### Action Plans

2. Part B of the draft plan outlines a Regional Action Plan – this proposes the key regional objectives and actions the councils will undertake collectively.

Do you have any comments on this Regional Action Plan?

Under Section 44 of the Act our company is able to recovery and process all end-of-life tyres from landfill and illegal disposal or illegal export. Wellington City Council along with other councils in the region does not need to cut and landfill scrap tyres. There is now proven technology to keep all scrap tyres out of landfills. We have the capacity to accept all scrap tyres from the region.

They could be dropped off at a central mustering area from each council transfer station or landfill. This will assist council in meeting the description in:

- R1 R7
- R2 R10
- R3 R11
- R4 R16
- R5
- R6

3. Part C of the draft plan outlines the actions proposed to be undertaken by Wellington City Council itself. Do you have any comments on the actions proposed?

We support WC4 – Business Development Grants  
We support WC5 – Product Stewardship (none currently exists for end of life tyres)  
We support WC9 – Tyres should be included in this section from all council vehicles

There is no specific mention of how council will divert scrap tyres from landfill in this section whilst there are several references to other specific materials. Scrap tyres have been identified by the MFE as special waste and one of the top products listed by local authorities to the Minister as a product that should be declared a PRIORITY PRODUCT FOR MANDATORY PRODUCT STEWARDSHIP SCHEMES. End of life tyres have been banned from landfills in the European Union since the early 1990's. Council and the surrounding local authorities in the region cannot support a product stewardship programme for end of life tyres if they are cut or shredded and landfilled.

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### Vision, objectives and guiding principles

4. Section 3 outlines the vision, goals, objectives and guiding principles of the draft WMMP. Do you have any comments on these aspects of the draft plan?

We support your vision and goals and hope the above section 3, regarding product stewardship around end of life tyres fits with your vision.

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### Other comments

5. Do you have any other comments on the draft WMMP?

Until now it has been difficult to recover end of life tyres because there have not been viable programmes in New Zealand. We invite members of the council to look at our website and contact us for further information. We invite members of the council to tour our facility in the Waikato. Currently we are accepting and processing tyres from around the country. Our plant and equipment is capable of processing all end of life tyres in New Zealand (up to 4 million per year). It is not a mobile service much like OI Glass. The country only requires one facility this size.

We support your Regional Plan and believe it is a positive step toward increased resource recovery

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by email to:  
policy.submission@wcc.govt.nz


by letter to:  
Wellington City Council PO Box 2199 Wellington 6140 Attention: Sharon Bennett

by fax to:  
(04) 801 3231

Freepost 2199 Policy and Planning (COP001) Wellington City  
Council PO Box 2199 Wellington 6140

# Carbon Recovery Ltd

Tyre Recycling



**Carbon Recovery Ltd has developed a nationwide collection and recycling programme for end-of-life scrap tyres of all sizes.**

Scrap tyres have become a problem waste in New Zealand. According to the Ministry for the Environment about 4 million each year or 11,000 every day need to be disposed of appropriately in order to reduce the risk to people and the environment.

Carbon Recovery Ltd has the solution. Our tyre recycling programme enables tyre retailers, council transfer stations and scrap tyre clean up initiatives to recycle all unwanted scrap tyres safely and avoid landfilling or accumulating them on your property. We have the capacity to recycle all of New Zealand's scrap tyres regardless of size.

Become a recycling partner and protect our environment and conserve resources through the Carbon Recovery programme.

*It's easy:*

✓ The Carbon Recovery programme supports the New Zealand Waste Strategy and the Waste Minimisation Act 2008 by providing a zero waste scrap tyre recycling programme. It supports the efforts of local councils to minimise waste and recover resources. And it supports the efforts of regional councils dealing with illegal dumping and tyre clean up projects.

✓ Transfer stations, recycling centres, resource recovery parks and landfill operators can collect and recycle unwanted scrap tyres through Carbon Recovery Ltd

- ④ Go to our website at [www.carbonrecovery.co.nz](http://www.carbonrecovery.co.nz)
- ④ Email [carbonrecovery@xtra.co.nz](mailto:carbonrecovery@xtra.co.nz)
- ④ Freephone 0800 868 473

Once the container has been filled and we have received confirmation, a container lifter will be dispatched for collection. Specialised collection services will operate for larger tyres. Some collections at your location may involve different trucks that can handle large off the road (OTR) tyres.

We can collect and recycle any size of tyre, and none need to go to landfill!

Don't leave tyres as a problem for the next generation to fix.



## Storage and Transportation

**Carbon Recovery Ltd**  
Tyre Recycling



## Don't waste resources!

### What to do:

1. Carefully assess what you currently do with tyres and track their final destination. Are they going to landfill? Are they going to farms?
2. Join our programme online at [www.carbonrecovery.co.nz](http://www.carbonrecovery.co.nz). You can also book by phone, email, fax or post.
3. You will receive a contract for services by way of a letter of agreement, which both parties will sign.
4. A container will be dropped off at your site
5. Your transfer station, landfill or recycling centre staff will accept tyres for recycling from the public and commercial operators. Stack them in the container provided then call us for collection.

### Storage and transportation

It is important that tyres are placed into containers to reduce risk to the environment.

Using containers to store and transport tyres reduces the risk of illegal dumping and disposal. Regional Councils and Local Authorities can be confident our storage and collection system is safe, secure and reduces any health and safety risk.

It is the responsibility of your transfer station, landfill or site managers to ensure scrap tyres are stacked into the containers provided. Carbon Recovery will pay an agreed fee for this activity.

### Illegally dumped tyres

We can work with your council to clean up illegally dumped tyres in your district or region.

Make sure your next clean up of illegally dumped tyres mean they don't end up in another illegal pile or a landfill. Let us collect, recover and process the scrap tyres for legal and approved export.

Do not contract substandard companies to and dispose of tyres to unknown destinations. We'll use the same systems and high environmental standards as we do for collecting tyres at your transfer stations, recycling centres or landfills.

# Frequently Asked Questions

**Carbon Recovery Ltd**  
Tyre Recycling

- ③ Why don't we just continue to landfill tyres if it is the cheapest option?  
First of all tyres are recyclable and don't need to be put into landfills. Many countries around the world have banned tyres from landfill because there are better options, like recycling. Tyre recycling is supported in the New Zealand Waste Strategy and the Waste Minimisation Act 2008.
- ③ Why do we need to charge separately for tyres?  
Because tyres are heavy to transport, difficult to process and require special handling and exporting to overseas markets - charges are required. Also, there is a cost for collecting and recycling almost all other products.
- ③ How do I get started?  
Contact Carbon Recovery on our Free phone 0800 868 473, or go to the Carbon Recovery website and complete a request for services on our contact page. You can also fax Carbon Recovery on 07 578 3949.
- ③ Why use Carbon Recovery Ltd?  
Because Carbon Recovery Ltd has the capacity to recover and recycle all of New Zealand's tyres. We have a zero waste to landfill policy and processing tyres for Tyre Derived Fuel (TDF) is the #1 method for scrap Carbon Recovery worldwide. It is also what is recommended by the tyre industry as the most efficient way to recover and recycle scrap tyres.
- ③ I have a pile of tyres at my transfer station. What do I do with them?  
Call Carbon Recovery today and we'll supply a 20ft lockable container to your site to collect and recycle tyres of all sizes. See the section on who pays?
- ③ What if I have a one-off clean up project in my district or region?  
No problem. A representative from Carbon Recovery Ltd will meet with you to discuss any clean-up operation in your region. We can recover and recycle tyres of any size and number.
- ③ Can I combine tyres of different sizes into one container?  
Yes! You can mix the tyre sizes in the container. We'll supply a loading docket and information to assist your staff with loading requirements. Remember to keep a record of the type and number of tyres loaded so we can reimburse you for your handling/administration fee.
- ③ What about the tyres importers and retailers and Ministry for the Environment (MFE)?  
At this stage, the tyre brand owners, retailers and importers and central government have not developed and do not have plans to develop any voluntary or mandatory product stewardship schemes. Tyres have not been identified as a priority product by the MFE and they do not attract any special levy or fees.
- ③ How do we know that Carbon Recovery Ltd will actually recycle the tyres?  
Carbon Recovery Ltd has a zero waste to landfill policy and has been active over the past several years in trying to develop product stewardship schemes for scrap tyres. Carbon Recovery has contracts in place with the Korean Cement Industry. Documentation will be supplied upon request.
- ③ What about sending tyres to farms?  
Farms have been used as a free disposal outlet by the tyre industry for years. It's time to stop the flow of millions of scrap tyres to rural New Zealand. There are other options for silage and some farms have thousands of tyres in piles. Some regional councils are beginning to take a stronger stance on the issue by looking at policies to reduce or eliminate the flow of tyres to farms.
- ③ What about TyreTrack?  
TyreTrack was a scheme set up by the Ministry for the Environment and other stakeholders in 2004 to minimise illegal dumping of tyres and to improve recovery and recycling rates. The programme failed to meet its targets and has now been disbanded.
- ③ What about other recycling options?  
There are very few options to recover tyres efficiently. The tyre industry does not accept recycled tyres to make new products and tyres retreading is all but finished in New Zealand. Because of their high energy value the tyre industry recommend using tyres as a fuel in the cement industry.
- ③ What is Tyre Derived Fuel?  
Tyre derived fuel is the generic term given to pieces of tyre used as a fuel. Some experts say 70% of the world's tyres are recovered for alternative energy sources and they completely disappear at 650 Celsius, producing principally carbon dioxide and water. The temperature inside cement kilns is 1800 Celsius, which ensures complete combustion. The fuel has 20% more energy than coal by weight and up to five times less sulphur and meets air emission standards. It is environmentally sound and proven technology. Carbon Recovery Ltd can supply more information about TDF upon request.
- ③ Why do they have to be exported?  
We export most materials collected through recycling. Much of our paper, cardboard, plastic, scrap metal, electronic waste, etc is exported to markets overseas. Tyres are no different. There are no New Zealand businesses (cement or otherwise) that have the infrastructure to accept Tyre Derived Fuel.
- ③ What if your council needs to clean up illegally dumped tyres?  
Carbon Recovery Ltd can work with your council to recover tyres from any location i.e.: gullies, streams, vacant land, farms etc. We will ensure the tyres are collected, processed for recycling and exported to our markets overseas.



## Paying for the collection programme:

Industry (tyre retailers, importers and sellers of tyres) has failed to put product stewardship programmes into place. Many tyre outlets now charge the public a disposal fee of around \$5 per passenger tyre. However this fee does not get paid to tyre collectors. Anyone can collect scrap tyres. This practice is not set to change in the near future. The Ministry for the Environment has not imposed a levy or advanced recycling fee on tyres. They have not become a Priority Product – which means nothing has changed when it comes to scrap tyres.

There is a cost to removing tyres from the environment to cover the cost of collecting, transporting and processing for recycling. Most transfer stations now charge fees to accept tyres. Ultimately the person disposing of the tyre must pay the fees.

- 1. Passenger Tyres (PTE):** It is recommended a recycling fee of \$6 be collected for PTE's  
Passenger tyres also referred to as Passenger Tyre Equivalents in the industry are tyres approximately 9.5kg and under. This group of tyres are typically used on silage stacks. Although this practice should be stopped in New Zealand as we already have millions of tyres sitting on farms.
- 2. 4x4 Tyres:** Fees for light truck (4x4) tyres is recommended at \$9  
These tyres are 50% larger in size to Passenger Tyre Equivalents (PTE) and require higher processing and transportation because of the increased size. Fewer tyres fit into a container and tyres can weigh around 15kgs.
- 3. Large truck Tyres:** This size includes tyres over 20kg and collection will be by negotiation  
Large truck tyres have very little appeal for Agricultural use on silage stacks because of their large size and weight. They can be up to 5 times as heavy as passenger tyres. Tyres in this group are not normally taken to transfer stations in large volumes. Less than 100 would normally fit into a 20ft container.
- 4. Off the Road (OTR) Tyres:** Fees by negotiation, as these large tyres require special processing  
Off the road tyres (OTR) come in several sizes and fees for these will be by negotiation based on size and weight.

With our powerful machines we can process and recycle any tyre. Carbon Recovery Ltd has a pricing schedule for this category of tyres depending on their size and weight. Approximately 10 tyres of this category will fit into a 20ft-shipping container.

How are fees collected at your transfer station, landfill or recycling centre?

Many transfer stations, recycling centres and landfills already charge fees for tyres. Fees must be collected as a gate/recycling fee prior to loading tyres into containers by the transfer station, landfill or recycling centre staff. Once a container is full the site manager will contact Carbon Recovery Ltd. The container will be collected and unloaded at our processing centre. Once Carbon Recovery Ltd confirms the contents of the container; a reimbursement will be made to the transfer station, landfill or recycling centre to cover their handling/administration charge.

What about the clean up of illegally dumped of tyres?

No problem. In the event of a special collection for illegally dumped tyres within your region or district, fees are determined by location, tyre size(s) and the number of tyres.



## About Carbon Recovery Ltd

Carbon Recovery Ltd is a New Zealand owned business. The company has spent the past 10 years researching tyre-recycling practices around the world. Carbon Recovery Ltd has developed their business model based on worldwide 'best practice' for the recovery of scrap tyres.

All tyres collected by Carbon Recovery Ltd will be processed into tyre-derived fuel (TDF)

- All tyre derived fuel will be legally shipped off-shore
- Supply agreements for export of (TDF)

- Over 10 years of research and development
- Capacity to accept all sizes and volumes of tyres
- We support zero waste to landfill and product stewardship

Carbon Recovery hold memberships with the Waste Management Institute of New Zealand (WasteMINZ), and the Sustainable Business Network (SBN).

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recovery  
LIMITED