



AGENDA

Taranaki Solid Waste

Thursday 21 May 2020, 10.30am



Date: Thursday 21 May 2020, 10.30am

Venue: Via audio-visual zoom link

Members

Councillor N Walker	Taranaki Regional Council
Councillor R Handley	New Plymouth District Council
Councillor B Roach	South Taranaki District Council
Councillor A Jamieson	Stratford District Council

Apologies

Notification of Late Items

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Membership of Taranaki Solid Waste Management Committee

Neil Walker	Taranaki Regional Council
Alan Jamieson	Stratford District Council
Brian Roach	South Taranaki District Council
Richard Handley	New Plymouth District Council

Health and Safety Message

Emergency Procedure

In the event of an emergency, please exit through the emergency door in the committee room by the kitchen.

If you require assistance to exit please see a staff member.

Once you reach the bottom of the stairs make your way to the assembly point at the birdcage. Staff will guide you to an alternative route if necessary.

Earthquake

If there is an earthquake - drop, cover and hold where possible.

Please remain where you are until further instruction is given.



Date 21 May 2020

Subject: **Confirmation of Minutes - 20 February 2020**

Approved by: G K Bedford, Director - Environment Quality
B G Chamberlain, Chief Executive

Document: 2496895

Resolves

That the Taranaki Solid Waste Management Committee:

- a) takes as read and confirms the minutes and resolutions of the Taranaki Solid Waste Management Committee Meeting held in the Taranaki Regional Council Chambers, Thursday 20 February 2020 at 10.30am
- b) notes that the unconfirmed minutes of the Taranaki Solid Waste Management Committee meeting held in the Taranaki Regional Council chambers, 47 Cloten Road, Stratford, on Thursday 20 February 2020 at 10.30am, have been circulated to the New Plymouth District Council, Stratford District Council and the South Taranaki District Council for their receipt and information.

Matters arising

Appendices/Attachments

Document 2430273: Minutes Taranaki Solid Waste Management Committee - 20 February 2020



Date 20 February 2020, 10.30am
Venue: Taranaki Regional Council chambers, 47 Cloten Road, Stratford
Document: 2430273

Members	Councillors	N W Walker R Handley B Roach A Jamieson	Taranaki Regional Council New Plymouth District Council South Taranaki District Council Stratford District Council
Attending	Councillor	D McIntyre Mr G Bedford Mrs H Gerrard Ms J Mack Mrs K Hope Mr D Miller Mrs V Araba Ms T Jensen Ms J Dearden Ms T Rankin	(Taranaki Regional Council) (Taranaki Regional Council) (Taranaki Regional Council) (Taranaki Regional Council) (New Plymouth District Council) (South Taranaki District Council) (Stratford District Council) (EnviroWaste) (New Plymouth District Council) (Kellogg Rural Leadership Programme)

Apologies Apologies were received from Councillor M Bellringer, South Taranaki District Council and Mr M Oien, Stratford District Council.
Jamieson/Roach

Notification of There were no late items.

Late items

1. Appointment of Chairperson and Deputy Chairperson

1.1 Mr G K Bedford, Director Environment Quality, Taranaki Regional Council, called for nominations for Chairperson of the Taranaki Solid Waste Management Committee.

Nominated: Councillor N W Walker Roach/Handley

1.2 There being no further nominations, Councillor N W Walker (Taranaki Regional Council) was elected Chairperson of the Taranaki Solid Waste Management Committee.

- 1.3 Mr G K Bedford, Taranaki Regional Council, vacated the Chair to Councillor N W Walker.
- 1.4 Councillor N W Walker, Chairperson, called for nominations for Deputy Chairperson of the Taranaki Solid Waste Management Committee.

Nominated: Councillor A Jamieson Roach/Handley

- 1.5 There being no further nominations, Councillor A Jamieson (Stratford District Council) was elected Deputy Chairperson of the Taranaki Solid Waste Management Committee.

Resolves

That the Taranaki Solid Waste Management Committee:

- a) receives this memorandum *Appointment of Taranaki Solid Waste Management Committee Chairperson and Deputy Chairperson*
- b) appoints Councillor N W Walker, Taranaki Regional Council, as Chairperson of the Taranaki Solid Waste Management (Joint) Committee
- c) considers the appointment of a Deputy Chairperson of the Taranaki Solid Waste Management (Joint) Committee if required and appoints Councillor A Jamieson, Stratford District Council as Deputy Chairperson of the Taranaki Solid Waste Management (Joint) Committee
- d) agrees that the term of the appointment of the Chairperson and Deputy Chairperson of the Taranaki Solid Waste Management (Joint) Committee be until the October 2022 local authority elections unless resolved otherwise or section 30(9) of the Local Government Act 2002 applies.

Roach/Handley

2. Confirmation of Minutes - 22 August 2019

Resolves

That the Taranaki Solid Waste Management Committee:

- a) takes as read and confirms the minutes and resolutions of the Taranaki Solid Waste Management Committee meeting held at NPDC Materials Recovery Facility, Colson Road Landfill, New Plymouth on Thursday 22 August 2019 at 10.35am
- b) notes that the minutes of the Taranaki Solid Waste Management Committee meeting held at NPDC Materials Recovery Facility, Colson Road Landfill, New Plymouth on Thursday 22 August 2019 at 10.35am were authenticated by the Taranaki Solid Waste Management Committee Chairperson, N W Walker and the Taranaki Regional Council Chief Executive, B G Chamberlain, pursuant to standing orders.
- c) notes that the unconfirmed minutes of the Taranaki Solid Waste Management Committee meeting held at the NPDC Materials Recovery Facility, Colson Road Landfill, New Plymouth on Thursday 22 August 2019 at 10.35am, have been circulated to the Taranaki Regional Council, New Plymouth District Council,

Stratford District Council and South Taranaki District Council for their receipt and information.

Roach/Jamieson

3. Regional Waste Minimisation Officer Report

- 3.1 Ms J Dearden, New Plymouth District Council, spoke to the memorandum on significant activities undertaken by the RMO in collaboration with the district council officers, waste minimisation activities in the wider community and other matters of potential interest to the Committee.

Resolves

That the Taranaki Solid Waste Management Committee:

- a) receives the memorandum Regional Waste Minimisation Officer's Report and notes the activities of the Regional Waste Minimisation Officer.

Jamieson/Handley

4. Kellogg Rural Leadership

- 4.1 Mrs Trish Rankin, gave a presentation on an overview of the research that she has undertaken relating to farm waste and the circular economy.

Resolves

That the Taranaki Solid Waste Management Committee:

- a) receives the presentation by Trish Rankin "What a Waste! - My Story" Improve Farm Waste & Journey towards a Circular Economy.

Walker/Roach

Mrs Rankin left the meeting at 11.35am

5. TSWMC Regional Submission on Landfill Levy February 2020

- 5.1 Mrs K Hope, New Plymouth District Council, spoke to the memorandum to advise Members that the Ministry for the Environment (MfE) had released a consultation document, Reducing waste: a more effective landfill levy. Submissions were open up until 3 February 2020.

Resolves

That the Taranaki Solid Waste Management Committee:

- a) receives and notes the final submission to MfE on behalf of the TSWMC.

Handley/Roach

6. Update on NPDC Kerbside Foodscraps and Landfill Collection Service

- 6.1 Mrs K Hope, New Plymouth District Council, spoke to the memorandum to update members on NPDC's Kerbside collection of foodscraps as well as the landfill collection service.
- 6.2 It was noted that one of the tables has been updated since the agenda was compiled. Mrs K Hope, will circulate this to members.

Resolves

That the Taranaki Solid Waste Management Committee:

- a) receives the memorandum Update on NPDC Kerbside Foodscraps and Landfill Collection Service.

Handley/Roach

There being no further business, Committee Chairperson, Councillor N W Walker declared the meeting of the Taranaki Solid Waste Management Committee closed at 12noon.

Confirmed

Chairperson _____

N W Walker

21 May 2020



Date 21 May 2020

Subject: **Impact of Covid-19 on Taranaki solid waste services preliminary assessment**

Approved by: G K Bedford, Director - Environment Quality
B G Chamberlain, Chief Executive

Document: 2500823

Purpose

1. The purpose of this memorandum is to provide a preliminary assessment of the impact of Covid-19 on solid waste services in Taranaki.
2. This report provides information on the changes to solid waste kerbside, transfer station and MRF services during the Covid-19 Alert Levels 2, 3 and 4.

Recommendations

That the Taranaki Solid Waste Management Committee:

- a) receives the memorandum Impact of Covid-19 on Taranaki solid waste services preliminary assessment.

Discussion.

3. Attached is the memorandum Impact of Covid-19 on Taranaki solid waste services preliminary assessment.

Decision-making considerations

4. Part 6 (Planning, decision-making and accountability) of the *Local Government Act 2002* has been considered and documented in the preparation of this agenda item. The recommendations made in this item comply with the decision-making obligations of the *Act*.

Financial considerations—LTP/Annual Plan

5. This memorandum and the associated recommendations are consistent with the Council’s adopted Long-Term Plan and estimates. Any financial information included

in this memorandum has been prepared in accordance with generally accepted accounting practice.

Policy considerations

6. This memorandum and the associated recommendations are consistent with the policy documents and positions adopted by this Council under various legislative frameworks including, but not restricted to, the *Local Government Act 2002*, the *Resource Management Act 1991* and the *Local Government Official Information and Meetings Act 1987*.

Iwi considerations

7. This memorandum and the associated recommendations are consistent with the Council's policy for the development of Māori capacity to contribute to decision-making processes (schedule 10 of the *Local Government Act 2002*) as outlined in the adopted long-term plan and/or annual plan. Similarly, iwi involvement in adopted work programmes has been recognised in the preparation of this memorandum.

Legal considerations

8. This memorandum and the associated recommendations comply with the appropriate statutory requirements imposed upon the Council.

Appendices/Attachments

Document 2500830: Impact of Covid-19 on Taranaki solid waste services preliminary assessment



Reference: 8284469

Date: 13 May 2020

To: **Taranaki Solid Waste Management Committee**

SUBJECT: **IMPACT OF COVID-19 ON TARANAKI SOLID WASTE SERVICES PRELIMINARY ASSESSMENT**

Introduction

Due to the worldwide Covid-19 pandemic, New Zealand went into Alert Level 4 lock down on 26 March 2020 for just over four weeks. The country then moved into Alert Level 3 on 28 April 2020, and to Alert Level 2 on 14 May 2020.

Nationally it was confirmed that waste and recycling services were essential services which could continue to be provided during Alert Level 4, specifically as per the list below:

- collection of solid waste
- collection of recycling where practicable
- the disposal of solid waste
- processing of recycling where practicable, or alternatively, disposal

“Where practicable” will include a range of factors such an assessment by the service provider or facility operator as to whether the practice can be safely carried out.

Collection of commercial recycling was only deemed essential when supporting the activities of other essential services.

Service level changes in response to Covid-19

In Taranaki, the response to Covid-19 Alert Level 4 and 3 included a change the level of waste services provided to the community to ensure a minimum service continued to be provided while ensuring the safety of collection and transfer station staff. Table 1 summarises the changes to council services throughout Alert Levels.

A key factor in determining what services to provide was the operation of the Materials Recovery Facility (MRF). Due to the risk of Covid contaminated recycling being processed, the manual sorting at the MRF and the difficulty in maintaining safe physical distancing between sorting staff, the MRF was closed for both Level 3 and 4.

Table 1 Under Covid Alert Level 2-4 each council provided the following services:

Council	Kerbside collection			Transfer Stations/MRF		
	BAU (and L2)	Level 4	Level 3	BAU (and L2)	Level 4	Level 3
NPDC	Mixed recycling (fortnightly) Glass (fortnightly) Food scraps (weekly) Landfill (fortnightly)	Landfill (weekly)	Mixed recycling (fortnightly – but landfilled) Glass (fortnightly – not colour sorted at kerb) Food scraps (weekly) Landfill (fortnightly)	All waste streams accepted Normal operating hours. The Junction reuse shop open for sales and drop offs MRF operating Monday to Saturday	Landfill only for essential services and rural customers without kerbside service, normal opening hours. The Junction closed MRF closed	Landfill, glass recycling, and greenwaste accepted. No e-waste accepted. Mixed recycling accepted but landfilled The Junction closed; online cashless and contactless sales MRF closed
SDC	Mixed recycling (fortnightly) Glass (fortnightly) Landfill (weekly)	Landfill (weekly) Recycling (fortnightly – but landfilled)	Landfill (weekly) Recycling (fortnightly – but landfilled)	All waste streams accepted Normal operating hours.	Landfill only for essential services and rural customers without kerbside service, normal opening hours.	Landfill, glass recycling, and greenwaste accepted. No e-waste accepted. Mixed recycling accepted but landfilled
STDC	Mixed recycling (weekly) Glass (weekly) Landfill (weekly) Greenwaste (fortnightly)	Landfill (weekly)	Mixed recycling (weekly – but landfilled) Glass (weekly – not colour sorted at kerb) Landfill (weekly) Greenwaste (fortnightly)	All waste streams accepted Normal operating hours.	Landfill only for essential services and rural customers without kerbside service, normal opening hours.	Landfill, glass recycling, and greenwaste, e-waste accepted. Mixed recycling accepted but landfilled

As a result, the kerbside mixed recycling was either not collected (NPDC and STDC) during Alert Level 4, or collected and landfilled (SDC). Residents were encouraged to stockpile recycling but if they could not do this, to put it in their landfill bins.

Both glass recycling and food scraps collections were stopped at Alert Level 4 due to the manual handling and sorting at the kerbside with these services. Greenwaste collections (STDC) were also stopped as the greenwaste processing facility closed during Alert Level 4.

New Plymouth District Council also increased the frequency of the landfill collection to weekly in Alert Level 4 to allow residents to dispose of all waste at the kerbside, reducing the need to leave home to dispose of excess waste.

Landfills remained open as an essential service throughout both Alert Level 4 and 3.

Community response

The councils' response to the Alert Levels involved some significant changes to the kerbside collection in particular. The number of service requests logged for the waste services provides a good indication of how the community then responded to the changes (Figure 1).

The change to Level 4 saw a marked drop in service requests and the transition to landfill only collection in New Plymouth went relatively smoothly. Common requests mainly related to missed collections as a result of late presentation of bins due to collection times changing, often earlier than usual.

The transition back to Level 3, on Tuesday 28 April, resulted in a spike of service requests. The collection frequency for landfill bins reduced to fortnightly on the day of the Alert Level change and recycling services started again. There was some confusion as to what bins were being collected, compounded by issues with the online bin collection schedule and the smart phone app not updating in time. Most service requests related to landfill bins not being collected, particularly in those areas where it was not the collection week for landfill bins. This resulted in increased feedback on the effectiveness of communication about the change and allowing people more time to prepare. As mixed recycling was also being landfilled, residents felt that either bin should be collected if it was at the kerb. Due the limited number of trucks, we were unable to collect both landfill and mixed recycling bins in the same week (as these are normally collected fortnightly).

A similar trend was shown in Stratford, but to a lesser extent, reflective of the minimal changes to the kerbside service (only the glass collection stopped during Level 4). About half the service requests were related to missed bins.

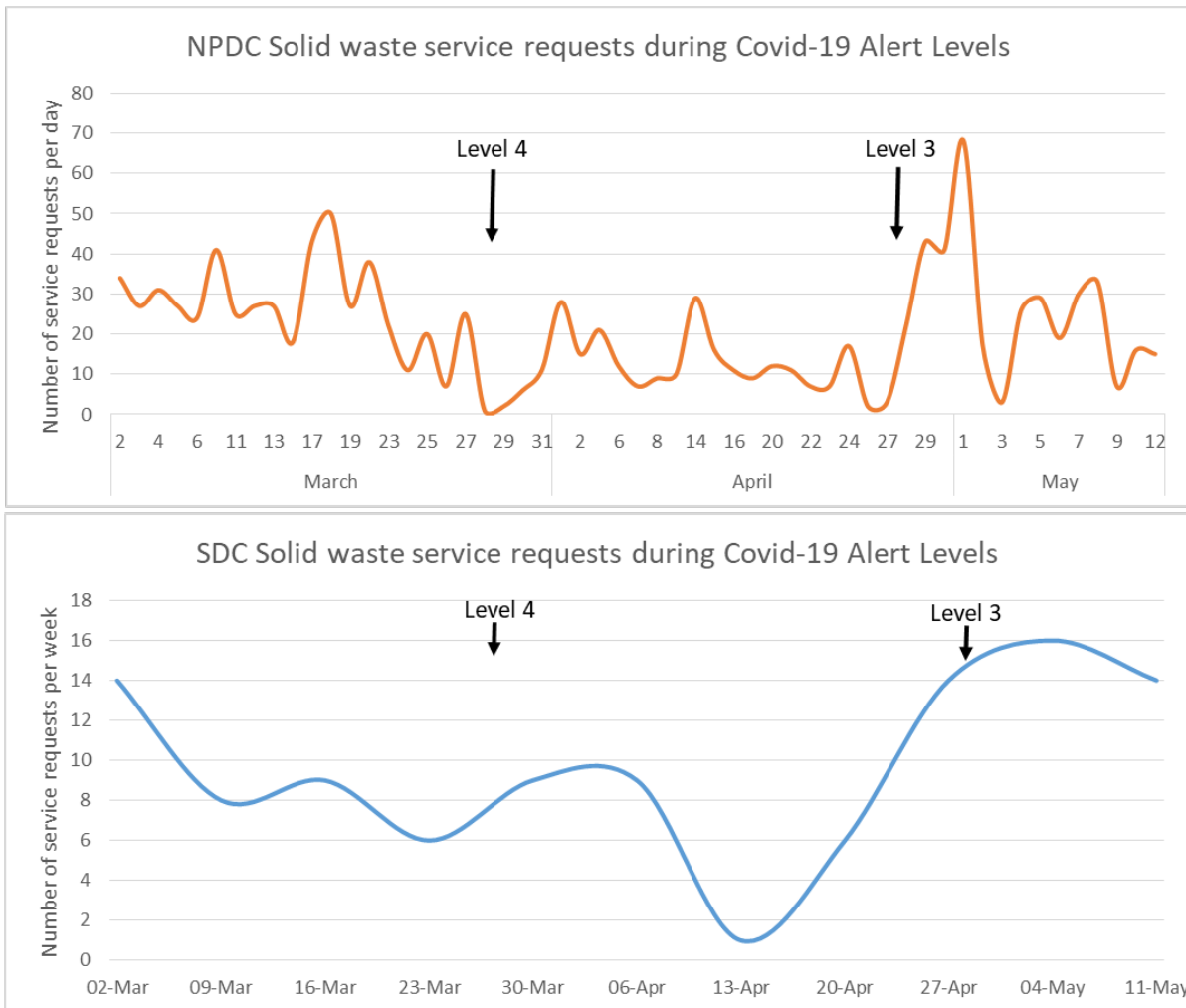


Figure 1 Waste service requests during Covid-19 level changes in the New Plymouth and Stratford districts

Volume of waste disposed

The waste tonnage data from the kerbside collection is available for Alert Level 4 (April).

1. Kerbside collection

Waste disposed to landfill during Level 4 increased significantly for New Plymouth District, but only slightly for the other two councils (Figure 2). This may be as a result of New Plymouth increasing the frequency of the landfill collection from fortnightly to weekly, allowing residents to landfill waste and recycling rather than stockpiling recycling. Both Stratford and South Taranaki continued to collect landfill bins at their normal frequency during the same period.

Interestingly, the total amount waste and recycling disposed during April was similar to March tonnages for New Plymouth and slightly less for the other two councils (Figure 3) indicating that during lockdown residents were generating similar or less amounts of waste than they normally would. It also indicates very little stockpiling of mixed recycling by residents in New Plymouth during Level 4.

For recycling, due to the lack of services, there was little or no recycling during April (Figure 2). The steady declining trend in previous months is due to the summer holiday period, as there are typically high volumes of kerbside waste and recycling in December and January compared to the rest of the year.

There were four days of kerbside organics collection in April, as Level 3 was implemented towards the end of the month. During those four days, there was only a 10% presentation rate for the organic collection for NPDC, indicating the community wasn't utilising the service. The low presentation rate and low tonnages of organics may be due to temporarily removing and then reinstating the service on short notice, not allowing adequate time for the community to separate their food scraps accordingly. Further communications and behaviour change initiatives may be required to encourage the community's use of the organics services.

Kerbside glass collections, on the other hand, had a very high presentation rate and glass volumes once collection returned in Level 3 (based on preliminary data for early May not presented below). This indicated that most residents had stockpiled glass during Level 4.

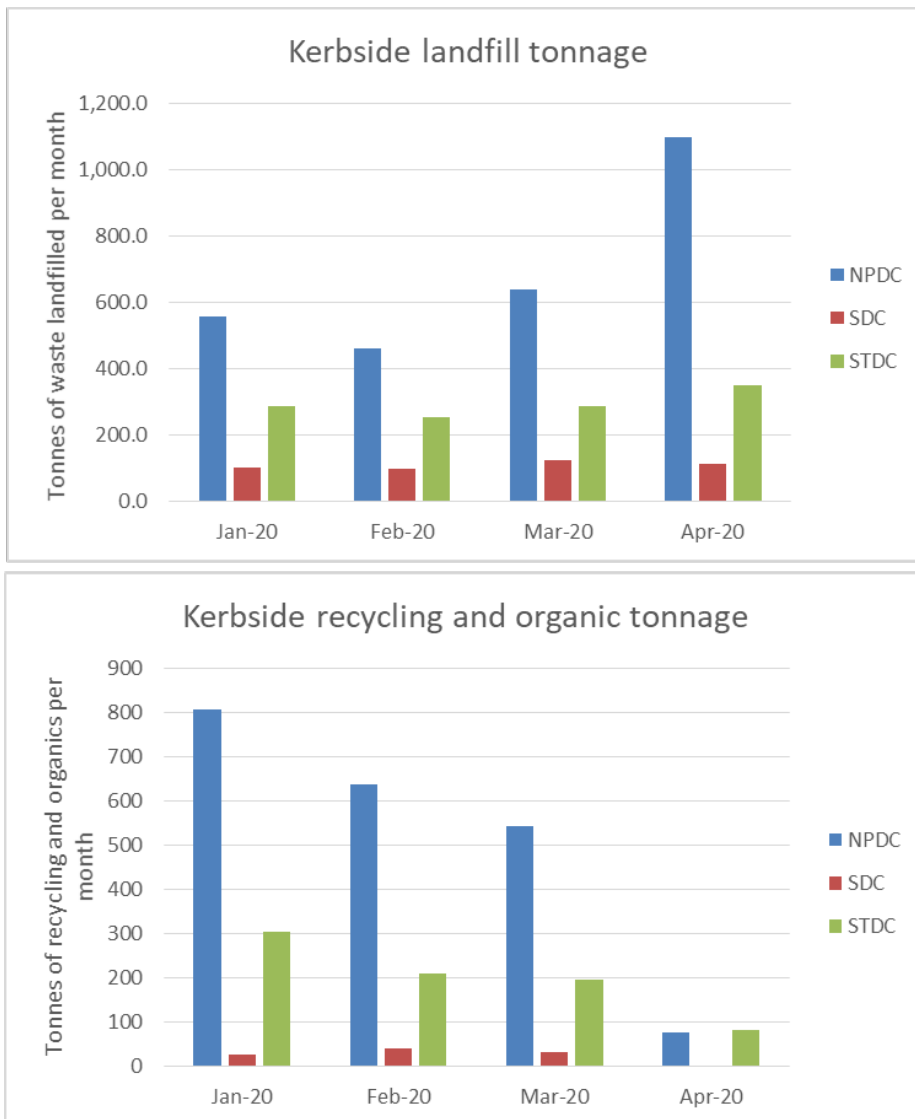


Figure 2 Kerbside collection volumes for the last four months

Stratford waste volumes decreased compared to March (Figure 3) and could be attributed to both the recycling and landfill services continuing during Level 4, allowing people to continue to use their bins as they normally would.

In South Taranaki, while total tonnage of waste and recycling decreased, landfill waste increased (Figure 3) compare to the previous month, as would be expected with only landfill bins being collected during Level 4.

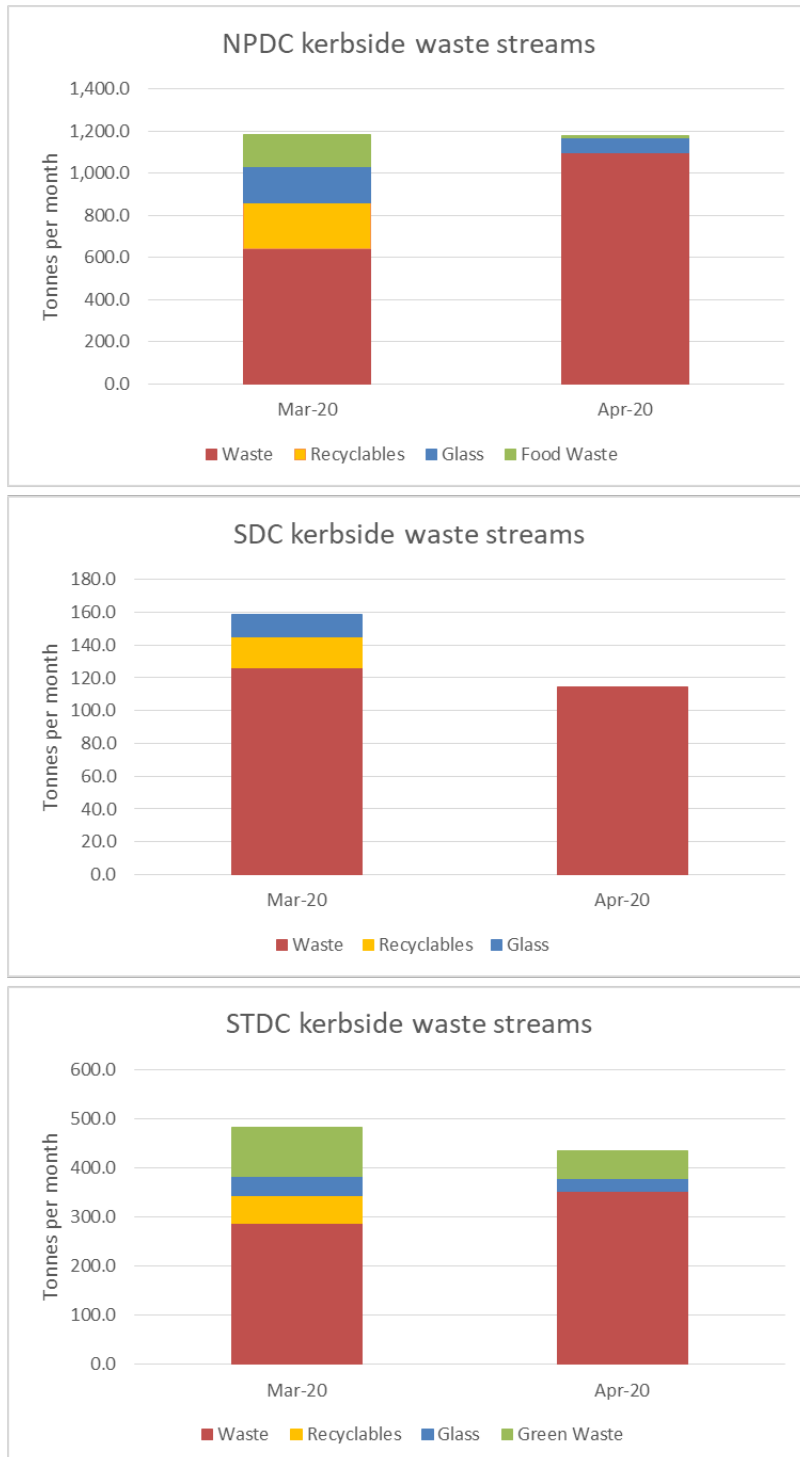


Figure 3 Total waste and recycling tonnages in April compare to March.

2. Transfer stations

Transfer station tonnages on the other hand, decreased significantly during Level 4 particularly in New Plymouth and Stratford districts (Figure 4). This is expected with all transfer stations only accepting waste from essential services and rural customers. A larger rural customer base in South Taranaki where there are seven transfer stations may explain the smaller drop in waste volumes.

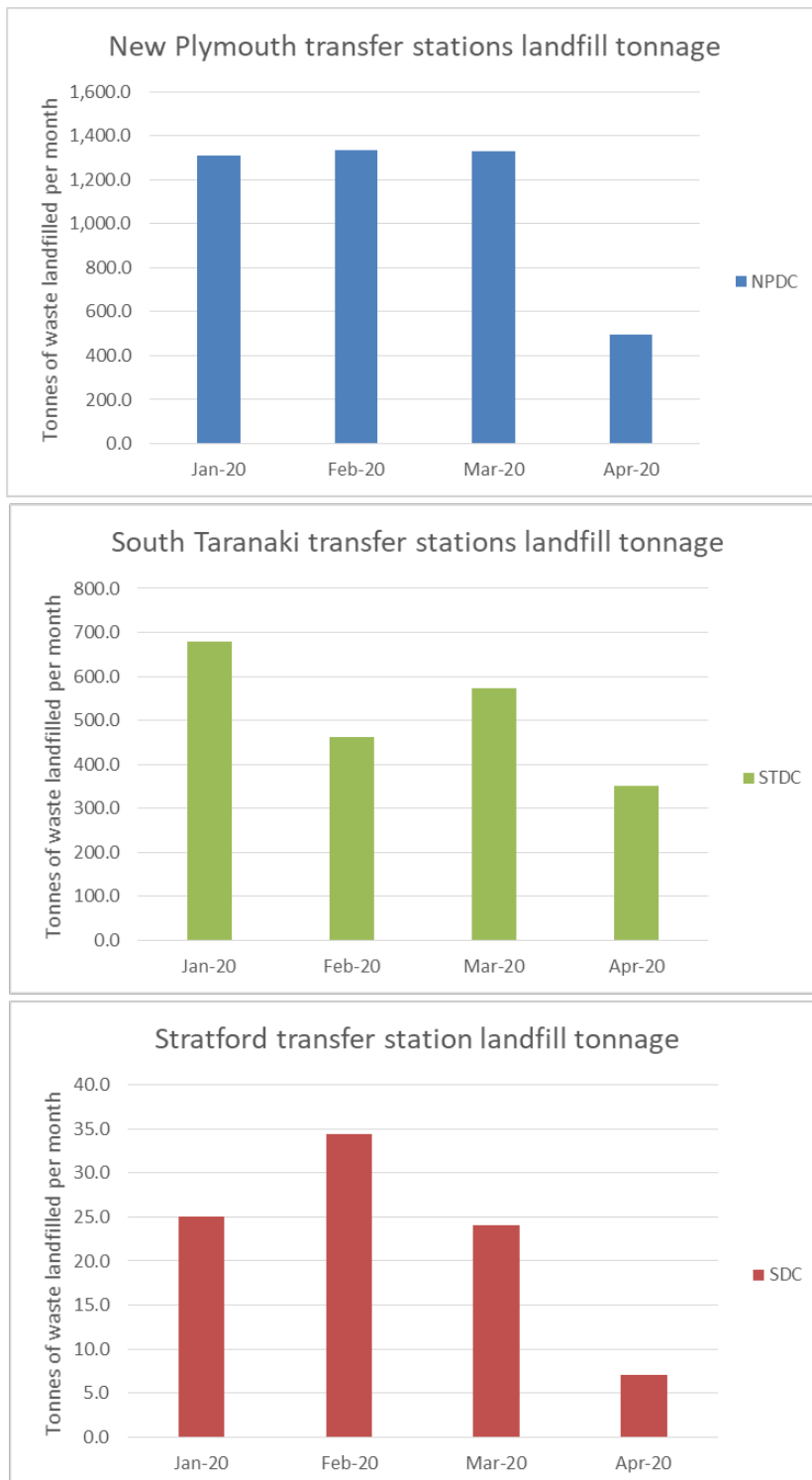


Figure 4 Waste disposal at transfer stations in the last four months

Key learnings to date

The pandemic has taken us into unprecedented times at a fast changing pace. While a formal debrief is still to be completed, the following points have been noted to enable improved planning for similar events in the future.

- Aligning with national guidance and messaging – due to the small window for movement into Level 4, initially there was little waste industry specific guidance which meant that local decision making on service levels occurred independently of the rest of the country. However, early in Level 4 working groups and communication channels were formed and this greatly assisted with planning for the changes to Level 3 being more in line with national guidance.
- The pandemic has also highlighted the importance of waste services to the community and that both landfill and recycling collections are an essential service.
- Communication of the Level 4 service level changes went well but communication during the return to the original collection frequency at Level 3 was less effective, although a regional approach was adopted. The landfilling of recycling at Level 3 caused some confusion with residents. Future response should consider maintaining normal public facing services throughout where possible and dealing with where the waste and recycling finally goes from a central point (i.e., the transfer station).
- The councils' contractor EnviroWaste Services Ltd has responded quickly, positively and safely during the transition through the Alert Levels providing our community with the essential services needed during the lockdown. We have been able to mobilise service changes quickly and seamlessly from an operational perspective.
- Dealing with exceptionally high volumes of glass once collection restarted has been the main operational issue in the first two weeks of Level 3. It is anticipated that there may also be some increased mixed recycling volumes as this starts to be recycled in Level 2.
- Due to the world wide impact of the pandemic, there has been effects on recycling markets for New Zealand (i.e., Auckland Council having to temporarily landfill paper). Also the pandemic has highlighted that food packaging companies may rely on recycled product such as glass further emphasising the essential nature of recycling services.

Opportunities

- There were behaviour change opportunities during the lockdown as people had time and limited capacity to leave the household which were built on through the development of waste minimisation tips. There is also further opportunity to encourage residents to continue with some of these habits while life returns to normal.
- The lockdown emphasised that clean recycling is important as people have had to stockpile recycling; the lockdown also has provided the community with a greater understanding how recycling is processed once it leaves the household.
- The need for onshore options for recycling processing has been further highlighted so we do not need to rely on offshore markets.

- The diversity of different waste and recycling services around the country was highlighted during the pandemic, particularly when trying to provide national guidance to the waste sector. This provides further weight for working towards national standardisation of waste services, a project which is currently underway.

Finally I would like to acknowledge council staff and the EnviroWaste team for enabling waste services to continue to be provided as an essential service. They have done an exceptional job during a difficult time to ensure that our waste has been dealt with during the pandemic.

Kimberley Hope
MANAGER RESOURCE RECOVERY



Date 21 May 2020

Subject: **Regional Waste Minimisation Officer's report**

Approved by: G K Bedford, Director - Environment Quality
B G Chamberlain, Chief Executive

Document: 2500812

Purpose

1. The purpose of this memorandum is to report on significant activities undertaken by the Regional Waste Minimisation Officer (RWMO), in collaboration with the district council officers of NPDC, STDC and SDC.
2. This report provides information on activities in the wider community, and matters of potential interest to the Committee from March – May 2020.

Recommendations

That the Taranaki Solid Waste Management Committee:

- a) receives the memorandum and notes the activities of the Regional Waste Minimisation Officer.
- b) endorses the four councils supporting the AGrecovery One-Stop Shop events proposed for late this year.

Discussion.

3. Attached is the Regional Waste Minimisation Officer's report.

Decision-making considerations

4. Part 6 (Planning, decision-making and accountability) of the *Local Government Act 2002* has been considered and documented in the preparation of this agenda item. The recommendations made in this item comply with the decision-making obligations of the *Act*.

Financial considerations—LTP/Annual Plan

5. This memorandum and the associated recommendations are consistent with the Council's adopted Long-Term Plan and estimates. Any financial information included

in this memorandum has been prepared in accordance with generally accepted accounting practice.

Policy considerations

6. This memorandum and the associated recommendations are consistent with the policy documents and positions adopted by this Council under various legislative frameworks including, but not restricted to, the *Local Government Act 2002*, the *Resource Management Act 1991* and the *Local Government Official Information and Meetings Act 1987*.

Iwi considerations

7. This memorandum and the associated recommendations are consistent with the Council's policy for the development of Māori capacity to contribute to decision-making processes (schedule 10 of the *Local Government Act 2002*) as outlined in the adopted long-term plan and/or annual plan. Similarly, iwi involvement in adopted work programmes has been recognised in the preparation of this memorandum.

Legal considerations

8. This memorandum and the associated recommendations comply with the appropriate statutory requirements imposed upon the Council.

Appendices/Attachments

Document 2500817: Regional Waste Minimisation Officer's Report



Agenda Memorandum

Date: 11 May 2020

**Memorandum to Chairperson and Members
Taranaki Solid Waste Management Committee**

SUBJECT: REGIONAL WASTE MINIMISATION OFFICER'S (RWMO) REPORT

March – May 2020

Purpose

The purpose of this memorandum is to report on significant activities undertaken by the Regional Waste Minimisation Officer (RWMO), in collaboration with the district council officers of NPDC, STDC and SDC.

This report provides information on activities in the wider community, and matters of potential interest to the Committee from March – May 2020.

Recommendation

That the Taranaki Solid Waste Management Committee:

1. Receives the memorandum and notes the activities of the Regional Waste Minimisation Officer.
2. Endorses the four councils supporting the AGrecovery One-Stop Shop events proposed for late this year.

Since the last meeting of the Committee held on February 2020 there has been a Global Pandemic of COVID-19. New Zealand has been on a National Civil Defence Alert Level system 1-4. Lock down at levels 3 and 4 has meant that waste minimisation events/gatherings and some projects within the community have had to be postponed to later in the year or modified.

All Zero Waste Events were put on hold, including ANZAC day 2020 and The Junction Official Opening and fun day. A call for Waste Levy funding applications at NPDC were due to be advertised in May but will now be made available later in the year.

Community Engagement

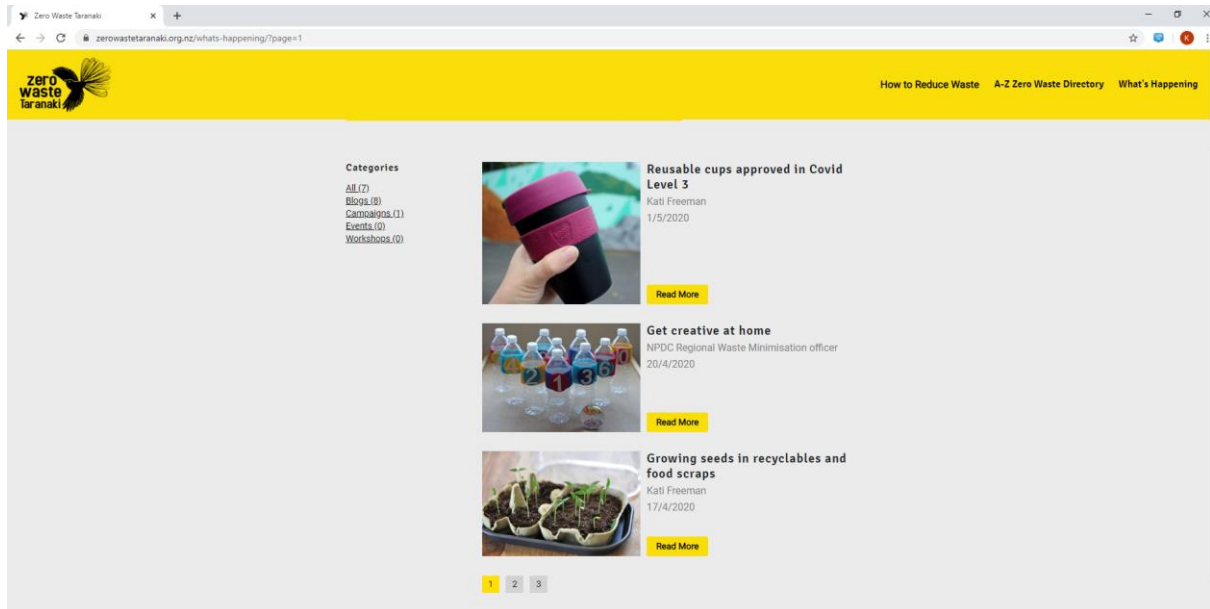
The focus for education and behaviour change in the region this year is **Reuse**. Where possible, any regional campaigns will use this theme. It also ties in with the opening of *The Junction Zero Waste Hub* (March 2020) which has a reuse shop and drop off area as well as interactive educational support on how to work towards Zero Waste.

Covid-19 campaign *NPDC*

The Regional WMO supported NPDC waste officers to develop collateral around waste minimisation during the Covid-19 lockdown. With a focus on Compost, Cook, Consider and Create a number of ideas and tips were shared with the community through social media, the NPDC website, and a number of blogs on the regional Zero Waste Taranaki website.



Taranaki Solid Waste Management Committee - Regional Waste Minimisation Officer's Report
 The blogs resulted in increased visits to the Zero Waste Taranaki website, increasing its profile. The team are now working on getting the community re-engaged in recycling as we start returning to normal.



AGrecovery – ‘One stop shop event’ *NPDC* *STDC* *SDC*

The three districts have engaged with AGrecovery to investigate holding ‘AGrecovery ONE-STOP SHOP EVENTS’ in the region. The aim of a One-Stop Shop event is to allow farmers and growers to safely and responsibly clear a range of farm waste in one go. These events are an extension of the AGrecovery Rural Waste Minimisation Project, designed to tackle some of the barriers to recycling that New Zealand’s rural communities face. Over 37,000 kilograms of waste was dropped off by 280 farmers at the six events held last year throughout New Zealand by AGrecovery.

AGrecovery will recycle or safely dispose of specific listed waste such as:

- Agrichemical containers & drums
- Unwanted agrichemicals
- Used motor oil

Taranaki has previously supported old chemical collections in 2015. It is proposed that the four Taranaki Councils support one event in each district, through providing funding support for unfunded aspects of the programme as has been done in previous years as well as providing a venue. Proposed timing is September 2020 and further details on the cost will be provided at the next meeting. Our aim is to clear as much from farms in the area as possible by making it easier for farmers to use the services and removing barriers such as cost of disposal. For the other waste streams such as bale wrap, feed and seed bags, and waste oil, it can be difficult to find recycling or disposal solutions for these outside of these events.

Regional Behaviour Change Strategy *NPDC* *STDC* *SDC*

All three districts have identified through their Waste Management and Minimisation Plans that a more strategic approach to behaviour change is required to increase the effectiveness of education and community engagement initiatives. The waste officers for all three councils have been engaged to develop a Regional Behaviour Change Strategy.

Zero Waste is a concept being adopted by countries all over the world. The concept is that of a society that has no “rubbish” being disposed to landfill, due to extremely high levels of resource efficiency, re-use, recycling, and re-purposing. Zero Waste societies focus on

'Waste' at a residential level is due to social, commercial and cultural behaviour, i.e., the choices people make when they are buying products, how those products are packaged, and how they are consumed, transported and stored.

Facilitating behaviour change around waste minimisation is a key factor in achieving the targets from each Councils' Waste Management and Minimisation Plan. We have clearly identified that there is a need to extend our current regional education programme to target businesses, schools and the community in a more effective way.

Behaviour change is the corner stone of successfully implementing sustainability processes². Changes in sustainability behaviours powerfully affect how people view themselves in their communities, and the uptake of sustainability-focussed behaviours directly affects our progress towards Zero Waste. Changes in how people view themselves and their influence on waste production can significantly affect their support for a campaign or a policy change. We now know that simply providing knowledge and education opportunities is not enough in itself to foster behaviour change. For this to occur, encouraging residents and communities to form and practice new habits around waste minimisation is the key.

The proposed strategy will outline our goals for achieving effective behaviour change and a regional action plan to implement the strategy. The plan will identify key projects in accordance with the waste hierarchy, to enable the community to move up the hierarchy toward reducing and reusing waste. The strategy will also outline how we work together on common branding and themes, as well as monitoring and measuring the effectiveness of new programmes so we can improve on these in the future.

A draft strategy is currently being completed and will be presented for approval at the next committee meeting.

Zero Waste Events – Toitupu Toiora - *NPDC*

Summer in Taranaki was a busy season for Zero Waste Events. A lot of progress has been made with events in the New Plymouth district with several event organisers running Zero Waste Events for the first time. A summary of the events supported and waste diversion achieved is provided below. As a region we are continuing to develop Zero waste events. New Plymouth District Council has put in place improved processes and infrastructure that allows the public to hire out bin infrastructure and safety gear, and apply for funding to support event waste minimisation. A bond form has successfully been designed and implemented (March 2020). This allows the WMO to process and track Zero Waste Event applications more efficiently and links to the event application form previously developed (December 2019). The applicant also then has some accountability and ownership of the event when applying for funding.



¹ Circular economy concepts: <https://www.mfe.govt.nz/waste/circular-economy>

² Fostering Sustainable Behaviour, 2011: [Fostering sustainable behavior dmm.pdf](https://www.mfe.govt.nz/waste/circular-economy)



Health and safety is at the forefront of Zero Waste Events. NPDC has added gloves and vests to the available infrastructure for hire. We continue to request the use of volunteers at the sorting stations at all events (Landfill, Recycling, Organics and Glass) as the sorting process is essential to reducing contamination and ensuring targets for the diversion of waste from landfill are achieved. New wraps and lids for glass (brown, green and clear) will be made available for the next summer season November 2020.

Zero Waste Event applications summary - summer 2019/2020

The following table provides a summary of events supported by NPDC colour coded to indicate the level of diversion.

Month	Event	Numbers attendance	Landfill 240L bins	Recycling 240L bins	Organics 240 L bins	Diversion estimate	Trained Volunteers
October	<i>Puanga festival</i>	8,000	Yes	Yes	Yes	50%	No
November	<i>Tui Mai</i>	8,000	Yes	Yes	Yes	50%	No
January (NPDC)	<i>Breakers basketball</i>	3,000	4	5	4	61%	Yes
January (NPDC)	<i>Six60</i>	15,000	Yes	Yes	Yes	89%	Yes
January (NPDC)	<i>Ben Harper</i>	7,000	Yes	Yes	Yes	86%	Yes
January (NPDC)	<i>Breakers basketball</i>	3,000	4	5	4	86%	Yes
February	<i>Americana - Inglewood</i>	12,000	6	6	25	44%	Yes
February	<i>Americana - Waitara</i>	8,000	3	3	3	65%	Yes
February	<i>Americana - New Plymouth City</i>	10,000	3	3	3	50%	No
February	<i>St Pius School</i>	1,000	2	6	2	80%	Yes
February	<i>NP Water Ski Club</i>	1,000	5	5	5	79%	Yes
March	<i>MultiEthnic Extravaganza</i>	8,000	6	10	10	Below 50 %	No
March	<i>Koru Project</i>	3,000	3	4	3	67%	Yes

Under 50% diversion from landfill
At least 50-75% diversion from landfill
Above 75-100% diversion from landfill

The average number of bins in each waste stream also provides some interesting statistics. The aim is to have more recyclable, glass and organic bins in use compared to landfill i.e., a lower ratio of landfill bins per event. For the 2019/20 summer overall a ratio of 1 landfill bin to 3.6 other bins was achieved.

Average number of bins per waste stream

Landfill	4
Recycling	5.2
Organics	6.5
Glass	2.7

Overall, for the 2019/20 summer event season, 78% of waste was diverted from landfill as a result of the Toitupu Toiora Zero Waste Event initiatives which is a great result.



Opportunities for improvement for 2020/2021 summer season

A review of what went well and what we can improve on highlighted the following improvements to the Zero Waste Event service.

- **Weather:** Weather has proven through feedback to impact the grade of recyclable material and therefore limits diversion potential; i.e. wet paper and card board cannot be recycled.
- **Volunteers:** As noted above volunteers are essential in separating waste streams and helping monitor contamination of the waste streams - organics and recyclables. Sorting by volunteers results in higher diversion rates. However, many event organisers (*particularly those new to Zero Waste Events*) find this requirement difficult particularly with limited resources. It has been identified that a dedicated volunteer contractor offering this service could monitor and educate volunteers around this sorting process. Also training is essential before, during & after an event.
- **Zero Waste application review:** What happens if the applicant does not meet requirements of their waste plan they have submitted for their event? Should we fund the disposal of their waste if this requirement is not actively followed through?
- **Requirements for data on waste streams:** quantifying waste diversion at the end of an event is important for monitoring the success of these events. Communicating this requirement to waste contractors during the season has improved data capture and quality.

- Taranaki Solid Waste Management Committee - Regional Waste Minimisation Officer's Report
- **Bond & payment system:** This new process introduced in January has worked well and holds the applicant responsible for infrastructure issued, as well as providing a documented tracking system for Councils.
 - **Infrastructure:** Allowing reviews, updates to graphics, messaging and branding is essential as part of behaviour change. Yarrows stadium, TSB stadium and Festival of Lights have their own set of wraps and bin lids (pictured).
 - **Glass:** Glass recycling is in high demand but there are currently no bin lids or wraps for these. Bin wraps and lids (blue) infrastructure have been designed and will be in place next summer to increase glass recycling options at events.
 - **Branding development:** Bilingual signage and standardised national symbols/terminology is important to councils and to be used for consistency throughout NZ.

Waste Free With Kate - May and September 2020 - *NPDC* *STDC*

Waste Free Parenting (WFP) and Food Lovers Masterclass workshops (FLMC) in New Plymouth and Hawera planned for May 2020 will move online as a result of COVID-19. The Regional WMO and STDC Waste Minimisation Officer are facilitating these workshops with Kate Meads through waste levy funding.

STDC Waste free with Kate: Online 14-28th MAY

WFP: <https://www.facebook.com/events/2486170044989418/>

FLMC: <https://www.facebook.com/events/262854091559225/>

WFP: <https://www.eventfinda.co.nz/2020/waste-free-living-workshop-with-kate-meads/hawera>

FLMC : <https://www.eventfinda.co.nz/2020/south-taranaki-foodlovers-masterclass-online/virtual>

NPDC Waste free with Kate: Online 14-28th MAY

FLMC: <https://www.eventfinda.co.nz/2020/food-lovers-masterclass-with-kate-meads/new-plymouth>

WFP: <https://www.facebook.com/events/538709640018417>

FLMC <https://www.eventfinda.co.nz/2020/waste-free-parenting-workshop-with-kate-meads/new-plymouth>

WFP <https://www.facebook.com/events/1241554652720644/>

School/Higher Education Engagement

Sustainable menstruation education for young women “the cups revolution” - *NPDC* *STDC* *SDC*

All three district's WMO's along with the NPDC Zero Waste Education Officer have been working on sustainable period education for young women in schools in the region. With the impact of COVID-19, online engagement was considered but postponing these workshops was determined to allow for face to face facilitation and better engagement with the students. All workshops will be moved to September 2020 and Waste Free with Kate staff will be coordinating and running the regional workshops. These workshops will be funded by the district waste levy funding.

Reusable Coffee Cups - *NPDC* *STDC* *SDC*

New Plymouth District Council have previously supported research on how to better encourage the community to use reusable coffee cups (Taranaki Cup Library trial). Following this trial and a review of other reusable coffee cup initiatives by the three councils, all three districts are proposing to support Again Again to establish in the region.

The aim is to reduce the number of takeaway cups going into landfill. Each district will choose to either promote or subsidise the use of these reusable cups through Again Again. We see this as a very important step in changing how the cafés and public view waste from takeaway coffee cups. The fact that 295,000,000 disposable cups fill NZ landfills every year is astonishing and if we could curbe this it would have a huge impact on reducing waste going to our landfill while also being an important step in community behavior change.

Again Again Overview

Again Again is a reusable cup lending system, run by a Wellington social enterprise. By providing a fleet of reusable steel cups available by \$3 deposit and return at 180+ cafes around New Zealand, they aim to end single use coffee cup waste.

Cups are owned by Again Again, with customers paying a “usage fee” that they receive a full refund on when they return cups and lids. They can use the cups at any participating café and if they forget to bring their cup they can “rent” a new one. If they bring it back the deposit is returned to the customer. This overcomes a common barrier where consumers forget to bring their keep cup with them by allowing a library type system.

To participate, cafes sign up to the scheme and pay a fee. Cafes must also have capacity to sanitise the cups and lids in line with [Regulation 70](#) of the New Zealand [Food Regulations 2015](#), and be food licensed by NPDC or have a food service plan in place.



An Again Again ‘cup’ is made up of three components. These are ordered by participating cafes directly from Again Again, via an online portal or by email. The cups are made of stainless steel with 55% recycled materials in them and can be used 500 times. The lids are silicone. These need to be returned to Again Again at the end of their life for correct disposal. Although the lids are silicone, they only need to be used 16 times to compare with the damage of a single use plastic lid. The heat wraps are recyclable and made of recycled paper. They can also be reused by the customer as they can be slipped on to any size cup.

Taranaki Solid Waste Management Committee - Regional Waste Minimisation Officer's Report
Council WMOs will work with Again Again and cafes to roll out and increase engagement for this system throughout Taranaki. While initially this was going to be a focus for Plastic Free July, due to COVID-19, there may be a delay in the roll out of this system.

Prepared by

Miss Jessica Dearden

*REGIONAL WASTE MINIMISATION OFFICER
New Plymouth District Council*



Date 21 May 2020

Subject: **District Council submissions on national environmental standards for outdoor storage of tyres**

Approved by: G K Bedford, Director - Environment Quality
B G Chamberlain, Chief Executive

Document: 2500700

Purpose

1. The purpose of this memorandum is to present for Members' information, the joint District Councils' (New Plymouth, South Taranaki and Stratford) submission sent to the Ministry for the Environment on the Proposed National Environmental Standards for the Outdoor Storage of Tyres (NES-OST).

Recommendations

That the Taranaki Solid Waste Management Committee:

- a) receives the memorandum entitled Ministry for the Environment Consultation (MfE) - Proposed National Environmental Standard for the Outdoor Storage of Tyres.

Discussion

2. Attached to this agenda memorandum is the District Council memorandum entitled Ministry for the Environment Consultation (MfE) - Proposed National Environmental Standard for the Outdoor Storage of Tyres.
3. A copy of the final District Council submission is attached for Members' information.

Decision-making considerations

4. Part 6 (Planning, decision-making and accountability) of the *Local Government Act 2002* has been considered and documented in the preparation of this agenda item. The recommendations made in this item comply with the decision-making obligations of the *Act*.

Financial considerations—LTP/Annual Plan

5. This memorandum and the associated recommendations are consistent with the Council's adopted Long-Term Plan and estimates. Any financial information included in this memorandum has been prepared in accordance with generally accepted accounting practice.

Policy considerations

6. This memorandum and the associated recommendations are consistent with the policy documents and positions adopted by this Council under various legislative frameworks including, but not restricted to, the *Local Government Act 2002*, the *Resource Management Act 1991* and the *Local Government Official Information and Meetings Act 1987*.

Iwi considerations

7. This memorandum and the associated recommendations are consistent with the Council's policy for the development of Māori capacity to contribute to decision-making processes (schedule 10 of the *Local Government Act 2002*) as outlined in the adopted long-term plan and/or annual plan. Similarly, iwi involvement in adopted work programmes has been recognised in the preparation of this memorandum.

Legal considerations

8. This memorandum and the associated recommendations comply with the appropriate statutory requirements imposed upon the Council.

Appendices/Attachments

Document 2500796: Ministry for the Environment Consultation (MfE) - Proposed National Environmental Standard for the Outdoor Storage of Tyres (NPDC Reference 8284032)

Document 2500801: Your submission to Outdoor storage of tyres: reducing environmental risks



NPDC Reference: 8284032

Date: 13 May 2020

To: **Taranaki Solid Waste Management Committee****SUBJECT: MINISTRY FOR THE ENVIRONMENT CONSULTATION (MfE) – PROPOSED NATIONAL ENVIRONMENTAL STANDARD FOR THE OUTDOOR STORAGE OF TYRES****Background & Purpose:**

The Ministry for the Environment (MfE) called for submissions between January and February 2020 (extended to 22 April 2020 due to Covid-19) on a proposed National Environmental Standard (NES) for the Outdoor Storage of Tyres.

In New Zealand, most decisions on how resources are managed are made by local authorities (i.e., councils). The consultation is centred on whether it is appropriate to have a nationally consistent approach to the storage of tyres. In such instances, the Government can make a National Environmental Standard (NES) under Part 5 of the Resource Management Act 1991 (RMA) which would be implemented at the local level by councils. An NES takes effect without the need for council plan changes.

An NES can provide certainty by setting out national requirements and conditions for particular activities (e.g., relating to land use, water takes, discharges). Councils can have more stringent or lenient rules in their plans that prevail over an NES, only if the NES expressly states they can do so.

The problem

About four million car tyres and one million truck tyres reach their end of life every year in New Zealand. There is a lack of proper disposal options for tyres.

Informed anecdotal evidence suggests that in New Zealand it is common to stockpile used and end-of-life tyres with the intent of future reuse, reprocessing or sale. These piles are often uncovered and easily accessible to the public. As tyres degrade over time, they lose their commodity value, and this can decrease the incentive to store them appropriately and manage storage risks.

Storing or stockpiling tyres outdoors poses a risk of harm to the environment, human health and local communities particularly due to risks of fire, leaching of toxic material, proving breeding grounds for pests, becoming a financial liability resulting in illegal dumping and abandonment of stockpiles, and impacting on visual and amenity values.

NES options proposed

Three options have been proposed by the Ministry for consultation, building on previous work and consultation in 2017.

- Option A Tyre volumes equal to or more than a 200m³ threshold for resource consent – original proposal in 2017.
- Option B (New option) Tyre volumes equal to or more than a 200m³ threshold for resource consent; a permitted activity rule with requirements for tyre volumes of 40m³ or more per site 2,500 stacked tyres.
- Option C (New option) Tyre volumes equal to or more than a 100m³ threshold for resource consent; a permitted activity rule with requirements for tyre volumes of 40m³ or more per site 1,250 stacked tyres.

More information and the consultation document can be reviewed at:
<https://www.mfe.govt.nz/consultations/outdoor-storage-tyres>.

Taranaki District Councils' submission

A submission from the three district councils was drafted by officers from district council Strategy, Planning and Resource Recovery teams and was successfully submitted to the Ministry for the Environment on 22 April 2020.

The final submission is attached (NPDC Ref: ECM8275231).

Prepared by

Miss Jessica Dearden

*REGIONAL WASTE MINIMISATION OFFICER
New Plymouth District Council (NPDC)*

Your submission to Outdoor storage of tyres: reducing environmental risks

Taranaki Solid Waste Management Committee - District Council Submissions on National Environmental Standards for Outdoor Storage of T...

NPDC

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Taranaki

New Zealand

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Reference no: 20

Clause

1. Do you agree with responsibility for the NES sitting with regional councils rather than district councils? Why?

Position

yes

Notes

Agree that the responsibility for implementing, administrating and enforcing the NES should sit with Regional Councils as proposed. This is primarily because Regional Councils have the specific functions of managing the discharge of contaminants, the main issue that the NES seeks to control. We note that the NES has the potential to cover overlapping functions between Territorial Authorities (TAs) and Regional Council (RCs). It is important that there is a clear delineation of responsibilities between regional and district council responsibilities to avoid inconsistency and reduce duplication. For example the New Plymouth District Plan addresses the visual/amenity effects of outdoor storage (including tyres). However it is outside the functions of a District Council to assess the impacts of the discharge from that storage. NPDC welcomes further guidance on implementation.

Clause

2. Do you support having a resource consent threshold for outdoor storage of tyres below the previously proposed 200m3? Why?

Position

yes

Notes

Yes we support the requirement for resource consent that allows controls to be put in place for tyre stockpiles to reduce effects and that also enables monitoring. From a waste management perspective the proposed lower threshold for storage volumes is supported. This will be most effective provided there are final reuse, recycling or disposal options for tyres available. Therefore the provision for mandatory product stewardship for tyres and support of initiatives through the Waste Minimisation Fund that provides appropriate infrastructure within New Zealand for recycling of tyres should also be given priority. Council transfer stations in the New Plymouth District maintain stockpiles well within the lower threshold when there are not feasible disposal options available. However Taranaki has recently experienced difficulty in finding disposal options for tyres which are no longer accepted at landfill. If disposal options are not available, the potential for large stockpiles will be increased, which will increase investigation and compliance resource by the authorities implementing the NES. In terms of RMA monitoring and compliance functions, there is support for having a defined threshold or trigger for certainty. It is noted that a larger threshold could potentially create adverse effects, and a lower threshold could generate increased monitoring requirements that may be unreasonably time consuming given the lesser ratio of effect.

Clause

3. Do you support the addition of the proposed permitted activity rule with requirements? Why?

Position

yes

Notes

There is support for the NES-OST permitted activity rule as it provides clear direction on what controls are required, but keeps compliance costs down for businesses with smaller stockpiles where risk of effects are low. It needs to be clear that District Plans can have different and in some cases tighter controls than prescribed by the NES for amenity and the protection of special features. For example in some zones higher amenity is expected by the community (ie: residential zones). The NPDC Proposed District Plan controls "outdoor storage" (the definition includes tyres), and outdoor storage rules apply to some areas as follows: No outdoor storage shall: "1.exceed 14m3 in area on any one site; 2.be stored for eight, or more, consecutive weeks in any 12 month period; and 3.be visible from an adjoining property or a road. Except where all of the outdoor storage: 1.cannot be seen from a public place and surrounding properties; and/or 2. is screened by a continuous wall, fence or landscaping or a combination of all three, so that the outdoor storage is not visible from a public place and surrounding properties." It is important that the NES aligns with the recently released National Planning Standards. The New Plymouth District Plan has been drafted in accordance with this standard. There needs to be consistency in how the rules are applied in chapters. For example outdoor storage rules in the New Plymouth District Plan are located in the Area Specific Zone, rather than in the coastal or waterbodies chapter. Consistency with the definitions in the National Planning Standards is also required as described on page 18 of the consultation document. It is also important that any changes or consequential amendments resulting from the NES-OTS are able to be made outside the Schedule 1 process.

Clause

4. Do you have any suggestions on the indicative requirements in table 12

Notes

There is support for applying consistent rules (ie: setbacks) to align with other resource management activities, For example, activities 20m from a waterway, or 50m from the National Grid. This is inconsistent with New Plymouth Proposed District Plan that has a 10m setback for buildings from waterbodies and a 12m setback for sensitive activities from the National Grid. Inconsistent setbacks from similar features needs to be well justified and understood.

Clause

5. Which of the options (200m³ or 100m³) for setting a resource consent threshold do you support? Why?

Notes

The resource consent threshold, from an amenity perspective, may vary depending on the receiving environment. For examples 200m³ is acceptable in an industrial or rural area - noting that alternative sustainable options for disposal are not available. Should those options be available then on a large industrial or rural site then the area could be reduced to support removal to sustainable land use option. In a residential, open space zone and similar sensitive environment 100 m³ would be the sensible level to trigger a resource consent based on amenity effect. Beyond this it would be difficult to consider a situation where a higher storage level should be considered acceptable as a permitted activity.

Clause

6. How would the proposed options affect your business/organisation?

Notes

The operation teams in Taranaki's district councils manage 13 transfer stations (five in New Plymouth, one in Stratford and seven in South Taranaki). At these transfer stations stock piles are likely to remain under the permitted activity rule as long as there are final recycling or disposal options for tyres. Compliance costs will likely be low for these council services. It is unlikely these options would significantly impact TAs regulatory functions unless a decision was made to place the NES responsibilities with TAs instead of RCs. This is inappropriate and TAs would require additional staff/expertise to assess the impacts of discharges. Currently outdoor storage, and visual / amenity impacts of this is a matter that TA compliance officers deal with. NPDC has received complaints about outdoor storage in residential and rural environments in particular. Tyre storage would be considered in the same way as other storage activities such as vehicles, earthworks, pallets and a number of similar items.

Clause

7. Do you think the scope of the proposed NES should be extended to include indoor tyre storage? Why?

Notes

It is important that the outdoor storage restrictions do not result in an increase in unregulated indoor tyre facilities. The NES-OTS needs to close the gap and not create loopholes where warehouses are able to stockpile tyres without any control. This lack of management has the potential to lead to significant issues when it comes to sustainable disposal. However, this should not capture legitimate tyre businesses. It is noted that indoor storage is not a regulatory planning function unless triggered by a hazardous substance or a Building Act matter. The location and bulk of buildings are matters that are already regulated by District Plans.

Clause

8. Do you agree with the proposed exemption from the resource consent requirement for farm silage tyres? Why?

Notes

As a first point a product stewardship proposal is supported as this will assist with creating alternative avenues for tyres; find viable markets and reduce the amount of tyres stockpiled locally. However, workable rules are required to acknowledge existing activities, such as farm silage tyres, and the need to transition these to more sustainable practices. If farm silage tyres are exempt, we support the Ministry for the Environment working with the Ministry for Primary Industries on definitions and implementation guidance, incorporating best practice for silage production and storage that has a focus on minimising waste.

Clause

9. Do you have comments on the other aspects of the proposed NES?

Position

yes

Notes

Guidance will be required to ensure successful implementation of the NES. We would support incentives within the standard around the use of tyres in sustainable resource reuse.



Date 21 May 2020

Subject: **Taranaki Regional Council submission on the national environmental standard for outdoor storage of tyres**

Approved by: G K Bedford, Director - Environment Quality
B G Chamberlain, Chief Executive

Document: 2500700

Purpose

1. The purpose of this memorandum is to present for Members' information, the Taranaki Regional Council (TRC) submission sent to the Ministry for the Environment on the Proposed National Environmental Standards for the Outdoor Storage of Tyres (NES-OST). This submission was received and endorsed by the TRC, at the Ordinary Meeting held on 7 April 2020.

Executive summary

2. Under the RMA, regional plans must give effect to relevant national policy statements and national environmental standards.
3. Appended to this item for Members' information is the submission prepared on the Proposed National Environmental Standards for the Outdoor Storage of Tyres - due date 25 March 2020.

Recommendations

That the Taranaki Solid Waste Management Committee:

- a) receives the memorandum entitled Submission on national environmental standards for outdoor storage of tyres.

Background

4. The Government is reviewing various new Government regulations, policies and standards.
5. Under the RMA, regional plans must give effect to relevant national policy statements and national environmental standards. A recent initiative of interest to Council is the discussion paper on the proposed National Environmental Standards for Outdoor

Storage of Tyres – reducing environmental risk – refer to discussion paper found at: <https://www.mfe.govt.nz/consultations/outdoor-storage-tyres>.

6. The Government is seeking to establish national direction for the storage of tyres, which has been an ongoing issue that the Council has been contributing to and supporting for many years.
7. The risks and harm associated with large outdoor stockpiles of tyres in New Zealand (as outlined in the consultation information supporting the proposed NES-OST), are the risks of significant adverse effects from fire and from the discharge of contaminants from leaching of toxic material into the soil and, occasionally, groundwater and other water bodies, plus visual and amenity impacts.
8. In brief, the Government is proposing a new environmental standard – a National Environmental Standard for Outdoor Storage of Tyres – to set out national requirements and conditions for the outdoor storage of tyres to manage their associated risks and harm.

Discussion

9. A copy of the final submission is attached for Members' information. In brief, the submission is largely supportive of the proposals and provides a TRC response to questions posed of interest to the Council.
10. While the submission notes that the proposals are largely practical and supported by the Council, some points of concern are noted.
11. In particular, the submission questions proposals for relevant land use controls to be shifted for the NES-OST to regional councils (from district councils). The submission suggests that the primary concerns with stockpiled tyres on a continuing basis are aesthetic and vermin / disease / public health risk, together with the civil problems posed by abandoned stockpiles. It is suggested that district councils, through their land use functions, are the more appropriate authority under the RMA to address such effects.
12. The submission further provides feedback on the resource consent threshold for outdoor storage of tyres. The NES-OST proposes that the threshold above which a resource consent would be required for the outdoor storage of tyres is set at 100m³. However, the submission considers that a threshold of 200m³ for a consent to be required, is more appropriate and that a lower threshold might unnecessarily penalise legitimate businesses and activities for no environmental gain.

Decision-making considerations

13. Part 6 (Planning, decision-making and accountability) of the *Local Government Act 2002* has been considered and documented in the preparation of this agenda item. The recommendations made in this item comply with the decision-making obligations of the *Act*.

Financial considerations—LTP/Annual Plan

14. This memorandum and the associated recommendations are consistent with the Council's adopted Long-Term Plan and estimates. Any financial information included in this memorandum has been prepared in accordance with generally accepted accounting practice.

Policy considerations

15. This memorandum and the associated recommendations are consistent with the policy documents and positions adopted by the Council under various legislative frameworks including, but not restricted to, the *Local Government Act 2002*, the *Resource Management Act 1991* and the *Local Government Official Information and Meetings Act 1987*.

Iwi considerations

16. This memorandum and the associated recommendations are consistent with the Council's policy for the development of Māori capacity to contribute to decision-making processes (schedule 10 of the *Local Government Act 2002*) as outlined in the adopted long-term plan and/or annual plan. Similarly, iwi involvement in adopted work programmes has been recognised in the preparation of this memorandum.

Legal considerations

17. This memorandum and the associated recommendations comply with the appropriate statutory requirements imposed upon the Council.

Appendices/Attachments

Document 2461388: Submission on National Environmental Standard for Outdoor Storage of Tyres: reducing environmental risk

Taranaki Solid Waste Management Committee - Taranaki Regional Council Submission for the National Environmental Standard for Outdoor ...

Your submission to Outdoor storage of tyres: reducing environmental risks

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Reference no: 14

Clause

1. Do you agree with responsibility for the NES sitting with regional councils rather than district councils? Why?

Position

no

Notes

Overall, the Taranaki Regional Council sees philosophical and perhaps legal difficulties with the proposal that regional councils, rather than district councils, should be responsible for issuing and monitoring consents in respect of stockpiled tyres. The Council notes that the association of stockpiled tyres with an activity of discharge to land is tenuous. There is a significant difference between a very slow decomposition of a stockpile of tyres (with at most a minimal impact upon the surface layer of land beneath) and the hundreds of thousands of tyres abraded daily on New Zealand's roads; releasing all manner of contaminants, at an accelerated rate, into roadside drainage. Under section 15 of the RMA, no person may discharge contaminants into water or land (if it may reach water or comes from industrial or trade premises). Therefore, any existing stockpiles of tyres that are leaching toxins do not have existing use rights and currently require consent, as they would continue to do under the NES-OST regardless of which council is responsible for issuing consents. Council notes that one of the most significant threats from a tyre stockpile is that of fire. This would be a major environmental risk through discharges of toxic substances to air (interestingly the Ministry for the Environment proposals do not include any regulation that relates to reducing the risk of fire, although future guidance on that matter has been promised). However, it is noted that the intent of the controls being discussed is to avoid emissions - therefore unless a fire actually occurs there is no discharge to consent under Section 15 of the RMA. Council suggests that the primary concerns with stockpiled tyres on a continuing basis are aesthetic (unsightly piles) and vermin /disease / public health risk (e.g. rats and mosquitoes), together with the civil problems posed by abandoned stockpiles. Past proposals for the NES-OST envisaged that district councils, through their land use functions, were the more appropriate authority under the RMA to address the environmental adverse effects associated with the storage of outdoor tyres. Council considers that the proposal for regional councils to be assigned the primary responsibility for regulating stockpiles, via the mechanism of consenting discharges from a stockpile, may be open to challenge in the Environment Court. Council acknowledges the desirability of dealing with existing stockpiles, as well as moving to prevent un-managed stockpiles in the future. If it is ultimately decided by the Ministry for the Environment that the NES-OST is to be administered by regional councils, then the Council considers it is essential that the Ministry simultaneously move to direct district councils to implement land use controls. This would address the use of land for stockpiling and the aesthetic and human health matters noted above and as discussed in the consultation document (Amenity effects- page 11). The Council is concerned that the consultation document offers no timeframe for this intervention. Nationally consistent controls integrated with the NES-OST would be efficient.

Clause

2. Do you support having a resource consent threshold for outdoor storage of tyres below the previously proposed 200m³? Why?

Position

no

Notes

The NES-OST proposes that the threshold above which a resource consent would be required for the outdoor storage of tyres is set at 100m³. Previously the suggested threshold was 200m³. However, some submitters on previous proposals had suggested this was too high. Setting the threshold involves a balance between risk mitigation benefits against compliance requirements and costs. The Council considers that a threshold of 200m³ for a consent to be required, is practical and it holds the view that a lower threshold might unnecessarily penalise legitimate businesses and activities for no environmental gain. For example, a tyre business servicing 20 vehicles a day would cross the threshold of 100 m³ (1250 tyres, more or less) inside three weeks. For regional New Zealand, this poses risks around being able to secure transportation offsite on a sufficiently frequent basis to remain below the threshold. This applies especially given that the proposed NES-OST suggests that there should be no minimum time within which the threshold does not apply. The 200m³ threshold will reduce the likelihood of capturing non-target land uses (e.g. small or occasional stockpiling of tyres on wharves, racing tracks, farms, quarries, landscaping activities etc), while still empowering officers to identify and effectively deal with commercial-scale stockpiling or dumping of waste tyres. It is expected that a party seeking to indulge in illegal but profitable activity around stockpiled tyres would not be interested in only stockpiling less than 200m³ (approximately 2,500 tyres). The Council notes that the stockpiles around New Zealand that have caused problems to date appear to have been far above 2,500 tyres in size, let alone above 1,250.

Clause

3. Do you support the addition of the proposed permitted activity rule with requirements? Why?

Position

yes

Notes

The Council supports the proposal for a permitted activity class, with the conditions as proposed (and extended- see below). A nationally consistent and transparent set of requirements is both efficient (no consenting costs) and effective (good conditions to manage for certainty around environmental outcomes). The NES-OST would also provide councils with the ability to monitor the permitted activity and to recover the costs of this monitoring.

Clause

4. Do you have any suggestions on the indicative requirements in table 1?

Notes

Notwithstanding the support for a permitted activity rule, Council recommends amendments and additions to Table 1. These are: o the finalised wording in this table needs to be carefully considered, to avoid unintended consequences. The left hand column should stipulate 'stockpiles', rather than 'tyres' universally - it is not meant to refer to locations where individual tyres may be put to use, e.g. as buffers along the sides of wharves. o the limitation that stockpiles of tyres must not be located within 20 m of a water body captures stockpiles placed above aquifers that are less than 20 metres underground. The Council considers that this should not be its intent. Condition (c) should refer to "within 20 metres of any surface water body", and the Council wishes to add "nor within 50 metres of any bore used for consumptive purposes". o condition (e) is strongly supported, with the proviso that discharge of stormwater to a groundwater soakage system should be allowed if the soakage field is more than 50 metres from any bore used for consumptive purposes. There will be any number of rural businesses etc. that do not have access to a municipal sewerage system; if they are banned from using any stormwater soakage system at all, or from discharge to a surface water, they would have nowhere to dispose of their stormwater. o that effects to be managed as part of the permitted activity status are within scope of the RMA. Visual impacts and pests are likely to be better addressed through district council local government act and bylaw functions.

Clause

5. Which of the options (200m³ or 100m³) for setting a resource consent threshold do you support? Why?

Position

200m³

Notes

The Council considers that a threshold of 200m³ for a consent to be required, is practical and it holds the view that a lower threshold might unnecessarily penalise legitimate businesses and activities for no environmental gain. For example, a tyre business servicing 20 vehicles a day would cross the threshold of 100 m³ (1250 tyres, more or less) inside three weeks. For regional New Zealand, this poses risks around being able to secure transportation offsite on a sufficiently frequent basis to remain below the threshold. This applies especially given that the proposed NES-OST suggests that there should be no minimum time within which the threshold does not apply. The 200m³ threshold will reduce the likelihood of capture of non-target land uses (e.g. small or occasional stockpiling of tyres on wharves, racing tracks, farms, quarries, landscaping activities etc), while still empowering officers to identify and effectively deal with commercial-scale stockpiling or dumping of waste tyres. It is expected that a party seeking to indulge in illegal but profitable activity around stockpiled tyres would not be interested in only stockpiling less than 200m³ (approximately 2,500 tyres). The Council notes that the stockpiles around New Zealand that have caused problems to date appear to have been far above 2,500 tyres in size, let alone above 1,250.

Clause

6. How would the proposed options affect your business/organisation?

Notes

The NES-OST will have minimal impact upon the Taranaki Regional Council. The only known tyre stockpile in the region, of the size being discussed, is at a metals recycling yard that is already consented and regularly monitored. Council inspectors already routinely inspect every dairy farm in the region and so compliance with the permitted activity state/exemption from the consenting category can be confirmed with minimal extra effort.

Clause

7. Do you think the scope of the proposed NES should be extended to include indoor tyre storage? Why?

Position

yes

Notes

The Council recommends that the NES-OST be extended to include controls on indoor storage, appropriately calibrated so as not to impair legitimate business, such as tyre shops and transport depots, but targeting bulk storage as a hazardous facility. These controls should be delivered through nationally consistent requirements imposed within district plans or bylaws, based on the risk of fire. This would provide councils and building owners with a tool to use against 'fly by night' operators and avoid the community carrying the cost and consequences of such operators. The timing of these controls should be simultaneous within the NES-OST on outdoor storage, to avoid problem flight.

Clause

8. Do you agree with the proposed exemption from the resource consent requirement for farm silage tyres? Why?

Position

yes

Notes

The Council supports an exemption from the consenting requirements within the proposed NES-OST for farm silage tyres. The adoption of a 200m³ threshold for stockpiles would mean that there are very few instances in which the exemption would be required, at least in the Taranaki region. Most farmers aim to ensure a farm's ongoing productivity and profitability, and therefore have

a vested interest in avoiding pollution from conflagration, tyre degradation, habitat for vermin, or loss of pasture through bulk coverage by tyre storage. Moreover, in general, farmers move their stock of tyres around on at least an annual basis, thus avoiding cumulative effects. Therefore, the environmental concerns that the NES-OST seeks to address will not arise on farms, as a rule, and the imposition of an NES-OST is unnecessary and not justified in terms of environmental outcomes.

Clause

9. Do you have comments on the other aspects of the proposed NES?

Position

yes

Notes

Timing The Council further recommend that all elements of the NES-OST be delivered simultaneously. Alongside the promulgation of the NES-OST itself, Government direction to district councils on land use plus other guidance on applying the NES needs to be delivered at the same time. In addition, the Council remains concerned at the lack of demonstrable progress by the Ministry for the Environment and stakeholders on delivering a product stewardship scheme for tyres. The Council considers that the NES-OST should not be relied on as a backstop to compensate for a failure to complete a scheme in a timely manner. Consistency with other regulations The Council questions whether sufficient thought has been given to aligning provisions within the NES-OST with other regulations. For example, the buffer thresholds from waterbodies seem to be inconsistent with other NESs (e.g. NES-Plantation Forestry) and for no apparent reason. Council also notes no reference to ensuring other sensitive areas/values are protected. For example, the permitted activity conditions to give effect to the New Zealand Coastal Policy Statement and other national policy statements, also address outstanding natural character, features and landscapes, sites of significance to Māori, historic heritage, significant natural areas etc. Ability for Council to have more stringent rules in its plans The Council requests that the NES-OST allows Councils to have more stringent rules in its plans than provided in the NES. This would allow the Council to, for example, have smaller setback distances from waterways or stockpile sizes should there be a particular need in their region / district.