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Submission to the Ministry for the Environment on the Waste Minimisation in New Zealand Discussion Document

Introduction

National Council of Women New Zealand (NCWNZ) has long been concerned with the problem of **Waste Minimisation** in New Zealand and believes that improving waste management is vital in ensuring a healthy, viable and sustainable environment.

Submissions have been forwarded by NCWNZ since 1989 and at the National Meeting in 2000 a resolution was passed supporting a Zero Waste Policy.

NCWNZ welcomes this opportunity to participate in the current discussion.

NCWNZ has 26 branches throughout the country. These are attended by delegates representing 50 nationally organised societies and another 150 societies.

This submission is a collation of responses from branches as well as from members of the Environment Standing Committee of NCWNZ.

Respondents have provided anecdotal evidence of experiences and examples of waste management, both positive and negative.

General comments

We applaud the Ministry for the Environment for presenting this well set out document and for inviting public feed-back with a view to implementing the Minimisation Act 2008.

We deplore however, the delay in implementing earlier legislation on the same subject. It was noted in a submission in Aug 2006 that "even though 2002 saw the publication of the NZ Waste Strategy, nothing much seems to have been done that would indicate that a policy of zero waste has been adopted".

Now, almost three years later we are considering the issue again.

Government is to be commended for the actions it has actually taken, examples being the publication of "25 Easy Steps Towards Sustainability" and the promotion of the independent, community-based adult education programme, "Sustainable Living".

We sincerely hope that the present discussion document will lead to immediate action.

Specific comments: Part 1

Questions 1 and 2

Target 1

- Respondents were pleased to see an actual date set for an achievable reduction on quantity of waste but consider that 20% should be regarded as a minimum figure.
- It was noted that some areas have not only already established a baseline, but have also achieved a 20% reduction, so they should not be penalised if they cannot achieve a further 20% in the next 5 years.
- Already organisations like ECOES (Ecological Solutions and Environmental Education) have produced figures relating to waste per person, for example they quote the following statistics:
 - In Auckland 750kg per person p/a
 - In Waikato 650kg per person p/a.
- Therefore there should be no reason why the deadline 2015 should not be met

Target 2

- Monitoring the composition of waste is a major issue and will be dealt with again in the Summary to Part 1.
- It was noted that monitoring needs to take place at the waste source or waste input, not at the landfill site.
- It is a salutary exercise to visit a Waste Transfer Station and see how much material staff can recover before rubbish is forwarded to the landfill.

Target 3

- The problem of Organic Waste is a major issue and one that could and should be addressed promptly.
- Simply "monitoring" the composition is totally inadequate; considering the problems associated with organic waste in terms of methane gas and leachate, and comparing this with the potential benefits of keeping this material out of landfills and processing it to make fertiliser, there is every reason for the Government to treat this issue with urgency.

This subject will be dealt with further in Part 2.

Target 4

- The target date seems to be acceptable but again, simply monitoring the amount is not acceptable. The potential for re-use needs to be explored; there is vast scope for employment in "demolition trading" and this should be encouraged under the Government's employment strategy.

Targets 5/6

- Members regard hazardous waste as a priority and question "Why is this not happening already?"
- It was suggested that hazardous waste is a "moving target" i.e. what is acceptable in one decade may not be so in another and rather than regulatory standards it was suggested that perhaps we need a system of up-dating and educating to best practice.
- The NCWNZ submission in Feb 2000, regarding the definition of hazardous waste, asked whether "hazardous waste", in terms of ecotoxicity, includes potential bio-concentrations of trace metals along the food chain." We would put this question forward again.

Targets 7/8

- The time frame would appear to allow specific industries to work towards a system of stewardship relating to the hazardous components of waste from their industry and to make reduction at source. This question will be dealt with again in Part 2.
- The question of stewardship and what is seen as "planned obsolescence" is of concern to the members.
- The fact that it is easier and cheaper to buy a new appliance than it is to have an older one repaired, is not an efficient use of resources.
- Also, it is of particular concern that the target market for newer, brighter models is often our young people (especially where e-technology is concerned).

Targets 9/10

- This is an area where members felt that there is some "stalling". We wholeheartedly support the commitment to implement action "for their management and /or remediation."
- It was noted that contaminated sites do not, in fact, fall within the scope of waste Minimisation. Being of grave concern, they deserve to be treated separately.

Targets 11/12

- Again there is some question as to the delay; if there are existing regulatory standards then the question has to be asked "Why are they not being applied and why are the offenders not being fined?"
- The question was also asked as to who sets the standards, a national body or local councils? A local council, when questioned, could see the value in the Ministry providing a national reporting template; "this would support council's commitment to meeting its obligations, as well as ensuring a high level of consistency nationally."

Targets 13/14

- It was noted that these targets need to take place before a baseline for target 1 can be set and for targets 3/4 to happen.
- There is a concern that where local councils contract out the waste management in their area responsibilities tend to be off-loaded; it is not likely to be in the best interests (financially) for private companies to work towards waste minimisation.

Question 3 Pg 18

One target area not dealt with in the discussion document is glass bottles. Members have suggested that there should be a re-introduction of deposits on glass bottles, recoverable when returned. Another comment related to the innovative ways in which glass can be re-used e.g. its use in a Christchurch park to create a fake sand "beach".

Summary Part 1

The general opinion is that there needs to be emphasis on PREVENTION, i.e. waste reduction at the source.

The suggestion was put forward that, in the same way that businesses must produce a Financial report annually, so they should be required to produce an annual Environmental report.

These would provide factual evidence as to:

- The volume and content of waste products that go to landfills
- Any gas emissions (including for transport vehicles)
- Any by-products that create leachate,

This would provide accurate accounting of environmental impact, right across the board, not just at landfills.

If the information was available to the public, consumers could make informed choices and call for change, thus reducing the problem that the Ministry is having to address.

The second concern overall, is that while NCWNZ supports the targets set out in the document, we would like to see:

- what actions need to be taken to achieve these targets
- who is to be responsible for these actions
- where the funding will come from to carry out these actions

Part 2 Products that are Priorities for Stewardship

While we agree that the products already identified are high priority, members of NCWNZ are concerned that product stewardship seems to be geared towards cleaning up after the event. Prevention is preferable to cure.

Question 1 What products should be highest priority for mandatory stewardship?

Besides the list in the document. NCWNZ members have considered the following:

- Packaging
- Disposable nappies
- Food waste

Questions 2-5 will be dealt with for each product.

Packaging

Members provided anecdotal evidence of outrageous waste materials in packaging.

Figures provided by ECOES (Ecological Solutions and Environmental Education)

- 670,000 tonnes of packaging purchased by New Zealanders p/a
- 32-80kg per person goes to landfill

Less packaging would involve less cost to the producer, cheaper price for the consumer, less transport costs to carry product to destination, less waste material to landfill, less danger to the environment.

In terms of cost/benefit analysis less packaging is a winner both ways.

The proposal put forward in the Summary to Part 1 that businesses should provide an annual environmental report could well see an immediate reduction in non-essential packaging

"Disposable" Nappies

Figures provided by ECOES show that it takes:

- 1 cup of crude oil to make the plastic for 1 disposable nappy
- 4.5 trees to make the pulp for enough nappies for 1 baby for 2 1/2 years

4% of the population contribute this one product which is estimated to represent 1.9% of landfill. With reference to the "efficient use of materials" and "the environmental effects of waste disposal" we found these figures staggering.

On a positive note, it is encouraging to hear about a scheme to compost disposable nappies using HotRot technology. The original idea was the brainchild of a Christchurch schoolgirl and after a successful trial, a larger machine is being built; the Hurunui District Council is supporting the venture.

Government needs to encourage innovative ideas and the technology to develop them.

While this method might help to solve the problem of disposal, the members still question whether or not the product is sustainable.

Government might consider the UK system of subsidising the pick-up/wash scheme for re-usable nappies.

Food Waste

Organic waste makes up about 1/4 of waste at landfills (discussion doc.p13)

In terms of stewardship, each one of us contributes to the problem of food waste so we must all share in the responsibility for its disposal. And that should not be at the landfill where it creates serious environmental problems.

"25 easy Steps Towards Sustainability (MfE) promotes composting and worm farms. These solutions are not always feasible so local councils must take responsibility.

Christchurch City Council is to be commended for their introduction of the three-bin system at kerbside where one bin takes organic waste for composting.

Smaller councils like Selwyn, Ashburton, Mackenzie are already composting their food residuals as well as green waste and some other councils are giving private companies consents to carry out similar activity.

While NCWNZ is not in a position to produce a cost/benefit analysis of the scheme we would encourage the Ministry to explore the possibility of making it mandatory for all councils to provide facilities thereby achieving a win/win situation.

Part 3 Funding Criteria

The criteria listed are acceptable however the 5 and 6 could be re-worded to give them more "bite", to read:

- "a major degree of certainty that applicant can deliver/ that project can achieve its goals."

There is some concern that the criteria for use of the fund seems to be focused on scale rather than on effectiveness; small groups and small local authorities with local projects might be most effective in changing attitudes.

Part 4 Monitoring Waste

Is data on total tonnage of waste deposited at landfills really relevant? Such figures could no doubt be easily obtained although it was felt that if weighbridges have to be installed funding needs to be provided for this.

Data on waste composition is surely more relevant but it would be difficult and costly to obtain. Instead the money might be better spent elsewhere e.g. in making drastic reductions in the amount of material that arrives at the landfill.

Part 5 Waste Levy

NCWNZ is not in a position to specify how much or what type of cover material should be used but we feel strongly that it is ludicrous to propose that landfill operators should pay for material which is not waste but which is necessary for the safe operation of the site and the safety of the environment.

To suggest that each application should be treated on a case-by-case basis sounds like needless, costly bureaucracy.

Conclusion

The problem of waste management is on-going and as population increases so will the problem. However legislation alone will not be sufficient to cope. Every one needs to be challenged to accept personal responsibility and to take the initiative to find solutions and The Ministry needs to play its part in offering this challenge to all of New Zealand.

In saying that ..." public awareness (is) one of the cornerstones of a good waste management scheme" (p iiidiscussion doc.) the Ministry has pin-pointed the starting place.

The time is right, NCWNZ members feel, to capitalise on people's awareness of the current economic situation and the subsequent need to use our resources more wisely. There needs to be a greater awareness of the problem of waste but without frightening the population into an even deeper apathy. (If people knew that one 2.3kg lap-top creates 9 tonnes of waste or that \$250million of resources is thrown into landfills each year, (ECOES) would we stop and wonder what we are doing to the planet?).

Central Government, local government, businesses, big organizations small groups and individuals need to combine to raise the level of awareness. A glance at a website like Waste exchange (www.nothrow.co.nz) is enough to inspire us with the amazing possibilities for reducing waste, for example Health Dept wastepaper bins have become dressage markers for a pony club, and gumboots from a food manufacturer have been gratefully received by the International Red Cross and Red Crescent.

By accentuating the positives and eliminating the negatives all people will be encouraged to be more aware and carry that awareness to best practice.

Elizabeth Bang
National President

Mary McIntyre
Acting Convener, Environment Standing Committee