

**Submissions received by WasteMINZ on their Website re Waste Levy
20 June 2006**

I am in support of the levy, but would like to see a meaningful portion of it to go towards the community groups who put such effort into these issues.

Sheila Wrigley
Wakatipu Waste Recyclers

Waste minimisation is most difficult in rural councils. The spread and low number of people means that the economies of scale and centralised population are not possible for rural councils. Rural Councils need to be given more help if they are not to face significant difficulties especially with illegal dumping and the cost of imposing such a levy. Kaipara District for example has 20,000 people spread over a vast area. If waste is seen by the residents to be too expensive the opportunities for illegal dumping over a wide area are enormous.

Richard Conway
Kaipara District Council

Ruapehu District Council doubts there is any merit in the establishment of a solid waste management levy.

Ruapehu District Council is concerned with the:

- (i) the absence of detail on how the levy will be allocated and/or utilised
- (ii) the absence of good clear policy guidelines
- (iii) the potential for inequity in that not all Local Authorities within New Zealand operate landfills, however, it is assumed that all will have access to the established fund.

Council would strongly advocate for the opportunity to review and submit on any further proposal to be developed.

The Waste Levy should be viewed as part of a suite of sustainable solutions. The Packaging Accord is a more significant opportunity to develop sustainable resource use. When the Packaging Accord has been made compulsory it will ensure that manufacturers and importers take steps to reduce packaging waste and produce recyclable goods. Then use of container deposit levies would encourage reuse and recycling of resources. In hand with the packaging accord and container levy, the waste levy has the potential to be a useful tool. Developed on its own the waste levy is likely to be utilised to pick off the low hanging fruit of recyclables.

Peter Till
Ruapehu District Council

Submission from the Dunedin City Council Solid Waste team on the Draft Proposal for a Waste Levy in New Zealand 12 May 2006:

We are generally supportive of the proposal for a Waste Levy in New Zealand. Such a user-pays levy is necessary to support the NZ Waste Strategy, its waste minimisation goals, as well as our own Dunedin City Council Draft Resource Recovery and Waste Strategy.

However, for waste levies to work effectively, we suggest:

1. Proportionate allocation of funds collected within certain areas be returned to that area for local waste minimisation projects – therefore, we are opposed to:
 - the proposed contestable funding as outlined in paragraph 11, and
 - capping of allocation on a population basis
2. The Packaging Accord be made compulsory to ensure that manufacturers and importers of packaging redesign and reduce packaging waste
3. Container deposit levies be introduced to encourage re-use and recycling of bottles and other containers

Thanks for giving the opportunity to submit to the draft proposal for waste levies in New Zealand. After considering the document carefully and reviewing the comments made through the workshops held by LGNZ, the issues and comments we have suggested have already been raised through the workshop. Therefore we would like to give support to the document and comments pertaining to the workshops held by LGNZ.

Brandon Bouda
Waipa District Council

I have similar feelings to your comments I believe local government should have to bid for funds, many local government departments have commercial arms and there have been incidents where they have used there monopoly to keep out competition.

I also think you are right in respect of it being used on consultants it would be a shame to see this fund used for reports and in most cases these reports will re affirm what they already know.

Private enterprise will be the best vehicle to recycle materials that currently go to land fill but in sum cases they need a subsidy to get things started , but in the longer term I believe they will create markets such has been the case in concrete.

I also note there committee is very light on recycling contractors and perhaps there views have not been taken in to account.

Regards Brian Smith
Sustainable waste management Ltd

I support a levy on waste, although I think more pressure needs to be on the manufacturers of products that create the waste as the waste generators are somewhat limited in their choice of packaging and are inadvertently compelled to generate waste because of this. I think imported goods should also be addressed. This would help to reduce the waste generated by the public and businesses and also reduce the ongoing issue of illegal dumping.

Kelly Moselen
CBEC

We have briefly discussed this and are in general agreement with the proposal. We are considering an annual licencing charge in our revised Bylaw but it would be about \$50 pa. This is to register collectors and their days of operation as we have a user pays system largely outside Council's direct control.

Brian Hodge
Tauranga City Council

Plastics New Zealand does not support the current national waste levy proposal (Draft Proposal for a Waste Levy in New Zealand, 12 May 2006). Plastics New Zealand supports waste minimisation as evidenced by our 2003 Sustainability Initiative and Best Practice Programme. Our preference is that a number of waste minimisation funding options are considered.

Plastics New Zealand will actively participate in the formal public submission process for the consideration of a national waste levy when the Local Government and Environment Select Committee considers the Waste Minimisation (Solids) Bill.

Ket Bradshaw
Plastics NZ

A National Waste Levy for New Zealand - Submission from Wellington City Council. Wellington City Council is committed to the environmental principles behind the general intent of the national levy, however the proposal raises a number of issues that we feel need to be addressed.

- We feel that the Development Group has commenced a creditable process, but that the Councils participating do not reflect the views of those Councils who own and operate landfills. It would be useful from here on to have a broader group rather than just the parties who were in Court earlier in the year.
- Please bear in mind that Wellington City:

- Collects levies at the landfill to pay for kerbside recycling, waste minimisation and waste education.
- Owns and operates (under contract) an industrial composting plant for the diversion of green waste and biosolids.
- Owns and operates a landfill that is commercially successful and environmentally compliant.
- We are reluctant to support any initiative that would erode the work we have already done in this regard, or our funding base. Wellington City has addressed many of the problems faced in other areas and does not have any imperative to change. This should not be construed as a barrier, rather a consideration when making decisions. We can envisage an outcome where the national levy might subsume our local levy, but we would need assurance that money paid by Wellingtonians at Wellington's landfill would be reinvested in Wellington rather than another region. Any other iteration could effectively mean that Wellingtonians are subsidizing other areas.
- We would be interested to see the analysis supporting the assumption that the economic disincentives will reduce the amount of waste produced. Our experience has been that price increases need to be significant to effect any real change in behaviour. We also feel some of the practicalities of collecting the levy have been glossed over:
 - Many landfills have only one weighbridge for commercial vehicles only and do not have the capacity to weigh in and weigh out other vehicles. There will be costs associated with upgrading weighbridges to provide accurate reporting. We think that there are some risks with allowing some landfills to use standard weight equivalents.
 - Some landfills recover material after they have crossed the weighbridge. This means that the recovered items should not be subject to the levy, and a mechanism will be required to credit back that material.
 - Our experience with marketing biosolids compost leads us to believe this waste stream should be exempt. We also think there is a risk this could be the source of derision in the same way as the 'fart tax'.
 - It will be very difficult to distinguish fly tipped waste from other waste. It will look the same as other waste, and invariably the truck that picks it up will have other material that has not been fly tipped.
 - In theory, over time the levy should naturally disappear as waste is diverted and levy revenue drops.
 - It is becoming increasingly difficult to attain consent for landfills. Many Councils are now looking to alternatives such as waste to energy plants. It is important to understand if these plants will be subjected to the levy, as this could undermine the commercial viability of the projects currently being considered. We understand that there has been a shift away from a national focus towards a regional focus. This seems a more attractive path to follow because the logistics of moving waste means that solutions lend themselves towards regional resolution.

Mike Mendonca
Wellington City Council

In developing the details of a refined waste levy proposal, it will be important to give appropriate recognition to industries, including ourselves, that self manage and regulate their own waste, including through waste minimisation policies and on-site landfilling. Such activities carried out on-site do not put pressure on public landfills. It will be important to ensure that a waste levy regime effectively accounts for such "non public" arrangements to avoid, for example, artificial cross subsidies.

Kim Schmidt
New Zealand Aluminium Smelters Limited

Waste Levy Submission from West Coast Working Waste Group

As discussed and noted at the recent Waste Levy Workshops at Taupo and Christchurch the West Coast has the following issues that make the introduction of waste levies unacceptable:

- Lack of infrastructure for waste minimisation services
- Limited and variable waste minimisation services in each district
- Waste services are paid for mainly by ratepayers through the rates, paying a flat rate
- Low population in isolated scattered communities
- Waste measured in volumes at many small transfer stations and landfills
- Increasing landfill charge sees an increase in fly tipping in the bush, which is difficult to police due to distances involved and responsibilities of DOC on DOC owned land and rest areas
- Tourist hot spot with up to 7-800,000 tourists a year each bringing 1.5kg rubbish into the region daily
- Low profile of waste in the region and limited education resources
- Changes and costs associated with District and Regional Waste Plans
- Low volumes of waste making economic recovery unsustainable

The proposal suggests that the levy would not be spent on activities such as the costs of waste collection. However, this is the very area that the West Coast Region needs assistance with, setting up kerbside waste minimization and infrastructure such as sorting facilities, as the two waste streams would need to run together for economic reasons.

It is considered that the current document has been produced by the larger Metro councils without due consideration and input from smaller rural councils. The composition of the current working party needs to be broadened to encompass all views and concerns.

It should be noted that what is recyclable in urban areas of the country may not make economic sense in remote and rural locations.

Landfill levies are difficult to design and implement. A levy that is based simply on the quantity of waste gives no incentive to improve landfill practices, and excessive levies encourage illegal dumping which is a problem already on the West Coast.

The Waste Group which is representative of all West Coast Councils does not support the National Waste Levy proposal and considers that all funds raised and rated for waste services should stay with the local District Councils.

Regulation that reduces initial waste production at source may be a better method of enforcing waste reduction.

It is also considered the cost of administering such a levy would become prohibitive and monies raised would be an indirect tax to small local districts already subsidising tourism waste. The monies kept by the National levy would be lost to the West Coast Region as:

- allocation is on population basis related to tonnage (low populations, therefore low tonnage to landfill)
- the areas that West Coast local districts require funding is in capital infrastructure, refuse/recycling stations operation, recycling collections which are currently indicated as not eligible for funding.

Gill Pontin
West Coast Regional Council
