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The New Zealand Waste Strategy advocates an integrated approach to the problems of waste, a concept that is in keeping with international best practice. My comments below support the concept of an integrated approach and draw attention to how the draft proposal can better deliver an integrated approach.

Distribution

The draft proposal initially aims to generate \$32M of which \$31.4M would be available for distribution. This amount could make a significant contribution to waste reduction. However, if the proposed allocation process was implemented, this would mean that, on average, each TLA would be allocated \$430k. There seems to be no indication that TLAs should work together and so we will see a proliferation of what we have so far.

- “Education” will consist of distributing leaflets to householders and businesses telling them how to reduce their waste – a methodology that has proven to be ineffective when used on its own, but a good one for councils to put a tick in the box that says waste minimisation programme.
- Council appointed people to run waste minimisation programmes that have no background. I have come across the following:
 - “I was in the Parks department and then they made me the waste minimisation officer”
 - “When I started after completing my business qualification I had no idea of what a waste audit was”
 - “I have a horticulture qualification and got a job as the waste minimisation officer. I am trying to implement programmes into the local schools – are there any resources out there that I can use”.

There are also examples of Council waste minimisation programmes working across multiple council districts and these ones are reaping the benefits.

The basis for funding allocations for the “TLA” portion should be waste ‘sheds’. Council territories have been quite closely related to water and air sheds. However, waste sheds are much larger and these quite closely correspond to the LGNZ ‘zones’, where the six zones are amalgamated to become three waste sheds. Hence, the demarcations would be Bay of Plenty and Waikato northwards; the rest of the North Island a second shed and the South Island would be the third waste shed. This would allow for the greatest integration of programmes and best utilisation of resources.

Funds for the TLAs should be allocated on a contestable basis with priority given for those applications that show integration across council boundaries.

Research and Development

An area that has been glossed over completely in the draft proposal is research and development. When ACT implemented their NOWaste programme, they recognised that research and development was a crucial pillar to achieve success. They realised that in order to achieve their goals

they needed to put money into a substantial programme to find alternatives for their wastes.

The New Zealand industry responses that I have heard so far have indicated that the implementation of the levy will mean that they will not be able to financially continue with some of their current waste reduction and resource utilisation practices. While a subsidy to avert 'perverse outcomes' is a possible short-term option, a more permanent solution needs to be found. This is where it would be productive for industry to team up with researchers to come up with practical, long-term solutions; a process that should be supported through the waste levy.

Final Disposal Facility

The concept of a levy being charged against all solid waste at its final disposal facility does suggest a degree of integration. However, the question of what is the difference between, for example, sawdust being burnt in a co-generation plant and coal being burnt at a power station, is a very valid one. In essence there is no difference and hence, to be consistent on a final disposal facility, *all* material that produces air emissions should also be levied. That way, there would be no partiality given to transfer material from one medium to another for disposal. By the same logic, this would then mean that all wastewater should also be levied, thus removing the incentive to dispose of solid waste through the wastewater system.

If all of this is too hard to swallow initially, the legislation should be broad enough so that other waste streams could be included in the future.

An Integrated Approach

Overseas practices (e.g. The Netherlands and France) have shown that a fragmented approach produces disarray and failure but an integrated approach gets buy in from the people.

The integration needs to be across media (solid, liquid, gas and energy) as well as across agents (the government (local and national), business and the community) using tools (legislative/regulatory, voluntary, educational/informational and economic) in an integrated manner to achieve a true reduction in waste in New Zealand.