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Submission Draft Waste Management & Minimisation Plan 2022-2028

To: Manawatū District Council

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Overview:

We appreciate the opportunity to make a submission on the Draft Waste Management & Minimisation Plan (WMMP) 2022-2028.

Environment Network Manawatū (ENM) recognises the importance of effective and efficient waste management and minimisation within the Manawatū District (the District) and waste management systems that adequately protect public health. Supporting waste management and minimisation will help to give effect to the environmental outcomes trying to be achieved in the New Zealand Waste Strategy and Ministry for the Environment (MfE) Transforming recycling: Consultation document.

Background:

Environment Network Manawatū is the environment hub for the Manawatū Region with the key purpose of facilitating and enabling communication, cooperation, and increasing collective action amongst its member groups and the wider community. ENM provides leadership by

underpinning, fostering, and encouraging environmental initiatives in the region and our 60 current member groups are from throughout the Manawatū River Catchment with interests including biodiversity regeneration, freshwater management, citizen science, food security and resilience, sustainable living, alternative energies, and active transport. The network is organised into two collective focus areas: Manawatū Food Action Network and Manawatū River Source to Sea.

ENM's constitutional purposes are to:

- coordinate and communicate the efforts of the member groups to enhance the local environment:
 - actively protect, maintain, restore and enhance the environment of the Manawatū;
 - promote ideas to the wider community to encourage them to participate in environmental projects;
 - develop concerted long-term plans of action to enhance the environment and actively progress the implementation of these plans;
 - encourage the provision of “green” areas for passive recreation;
 - work together to identify, initiate, support, implement and maintain environmental projects that benefit the wider community; and
 - initiate, develop, implement and participate in environmental education.
- act as a central point of access to environmental information.
- advocate for ecological sustainability and matters of agreed environmental significance.
- work in partnership with iwi to recognise kaitiakitanga and environmental aims and objectives in common.
- liaise with similar organisations elsewhere in Aotearoa New Zealand and around the world as appropriate to source and share ideas for environmental projects and issues.

Manawatū River Source to Sea (S2S)

Manawatū River Source to Sea (S2S) is a collective of ENM member groups working together with the vision of engaging the community in collective action to enhance biodiversity and the mauri of the river in the Manawatū River catchment, and to build community wellbeing. The collective is currently delivering two projects, The Plastic Pollution Challenge (PPC) and the Southern Ruahine Kiwi Habitat Restoration Project.

Plastic Pollution Challenge

S2S collaborates with Massey University's Zero Waste Academy, Rangitāne o Manawatū, Te Kāuru Eastern Manawatū River Hapū Collective in Dannevirke and RECAP in Ashhurst to deliver the PPC. This project launched in 2019 to understand the scale of plastic pollution going into the Manawatū river via our urban streams and to use this knowledge to improve the health of our local waterways. A wide range of school children, students, community members, companies, council staff and academics have been involved to date.

Submission:

General comments

Fly tipping

“The current budget provided within the solid waste activity to deal with fly tipping waste disposal to landfill is currently adequate to address the complaints received. Fly tipping was not addressed within the 2016 WMMP, and perhaps should be considered in the 2022 review. Management of fly tipping going forward should be considered as part of the education promotion activities proposed, e.g. advertising drop off locations for different waste streams.”

There is a known problem with fly tipping, which is apparent through both discussions with community members and ENM member groups, and through the results of PPC stream clean up events. This is thought to be a combination of:

- societal/behavioural reasons, including education;
- cost of landfilling;
- inaccessibility/logistical issues around disposing of large waste items (e.g. large appliances or tyres); and
- minimal repercussion if caught, with low chance of being caught or reported.

This leads to significant environmental impacts and creates an exponential ripple effect of items being dumped at a place that looks unkempt, making a place continue to look unkempt, leading to more dumping. It is recommended that serious consideration go towards reducing fly tipping.

Climate Change

“Climate change is a current global issue. All initiatives and decisions made by council need to consider effects on the climate. It is recommended that MDC make a conscious effort to better consider climate change in the review of the WMMP in 2022. MDC do not currently have an Environmental or Climate Change strategy. Should Council adopt such a strategy, future reviews of the WMMP will need to align with any new strategic direction.”

Climate change is a critical issue locally, nationally and globally and this is reflected in the barrage of reviews, consultations and amendments for strategies, policies and legislation coming through from central government.

The Resource Management Amendment Act 2020 (RMA) aligns with the Climate Change Response (Zero Carbon) Amendment Act 2019 (Zero Carbon Act) by requiring RMA decision-makers to consider climate change mitigation plans that are published under the Zero Carbon Act. This allows MDC to consider climate change in their plan making and consenting decision. The substantial changes coming from central government recognises Aotearoa New Zealand is being affected by climate change and it's impacts and we urge MDC to be a leader in this space.

Energy from Waste

“Council has been approached by a private sector company who wishes to convert waste to energy via a Pyrolysis Plant on the Manawatū Resource Recovery Park site in Feilding. Conversations are ongoing in regards to this venture.”

We have also made a submission to Horizons Regional Council opposing the proposed pyrolysis plant. Pyrolysis is not compatible with Manawatū District Council’s (MDC) vision and goals to enable a circular economy for all waste streams. Pyrolysis has no place in a ‘circular economy’. It is a final step in the linear economy, following the “take-make-throw away” approach. It’s a false solution aimed at ‘tidying up’ the landfill ‘problem’.

Auditing waste

Much of the data in the 2022 waste assessment is extrapolated from Palmerston North urban waste data, and other regions rural waste data (e.g. Bay of Plenty). Additionally, much of this data is from 2014-2019 so many no longer show any accurate representation, especially post-COVID. This does not give an accurate picture of the waste situation being dealt with in the rural Manawatū District. We recommend waste audits to be done directly on the waste collected from sources that come under the MDC WMMP.

Ministry for the Environment Transforming recycling: Consultation document

We have also provided feedback on the MfE Transforming Recycling Consultation Document (Consultation Document) which if implemented, will significantly change the recycling systems across the country. Specifically for MDC, this may result in a standardised materials to be collected for kerbside recycling, and an increase in organic waste collections (food waste or green waste). Due to the timing of this WMMP consultation, it is likely that the Consultation Document, if implemented, will be released within a similar timeframe to the WMMP. This may result in the need for the WMMP to be revised significantly.

Waste Education Services

We support the emphasis on waste education services, including Enviroschools, Zero waste Education, Paper for Trees and Para Kore. Any increase in this area would be supported by ENM. Initiatives like Palmy’s Plastic Pollution Challenge (PPPC) have been effective for raising awareness around water quality and pollution, so expansion could be explored by the district, especially targeting schools.

Additionally, we support the Statement of Proposal to establish a dedicated role within MDC to focus on promotion and coordinating waste management and minimisation initiatives. This role would support waste education services, community engagement and all other aspects of the WMMP.

Changes in Central Government Policy and Legislation

“There are a number of emerging changes in Central Government policy that will influence how MDC manages and minimises waste. Council is already actively investing in infrastructure and initiatives required to enable a circular economy as reflected in Central Government policy. Namely, Council is currently considering partnership with an energy to waste provider, and has developed a proposal for a Plastics Recycling and Reuse Facility for Central Government Funding. In addition, the new Manawatū Resource Recovery Centre has considerably more capacity than the previous site, enabling larger volumes of waste to be processed and more materials to be diverted from landfill. A number of Central Government policy changes are outlined on the following page.”

Central government are proposing new and more comprehensive legislation on waste to replace the Waste Minimisation Act 2008 and the Litter Act 1979. This new legislation will reset the purposes, governance arrangements, and roles and responsibilities in legislation. This reflects the direction Aotearoa New Zealand are moving towards, which is a vision and aspiration for a low-waste Aotearoa guiding us all on a journey toward a circular economy.

MDC have the opportunity to spearhead change, be innovative and recognise kaitiakitanga over our land, water and air that support the well-being of our communities.

Action Plan: Kerbside Proposals

Kerbside Proposal One: Mobile Garbage Bin (Wheelie Bin) Refuse Collection Service

Having a mobile garbage bin would create consistency. Purchasing bags while shopping puts the onus on residents, which heavily depends on the responsibility and willingness to purchase these bags regularly. If waste needs to be disposed of but there are no bags on hand, there is likely to

be more contamination placed in recycling bins. Having wheelie bins, with charges incorporated into rates, will simplify the process and reduce the variance in waste behaviours.

We recommend option B: *“Provide all kerbside refuse customers in Feilding and the Villages of Rongotea, Sanson, Halcombe and Himatangi Beach with a mobile garbage bin (fortnightly collection if combined with rates funded weekly food waste collection)”*

Adding the charge to rates will go relatively unnoticed and reduce another weekly item to remember to purchase and the cost for grocery shopping. Especially due to the similar cost, the option to make this as simple and thought-free as possible is likely to have a significant impact on the environmental impacts. While this may increase the waste to landfill, it will reduce contamination of recycling, and reduce litter being burned, fly-tipped or similar.

Kerbside Proposal Two: Food Waste Collection

This should be integrated as much as possible, especially in Feilding. For rural settings where real home solutions are in place, the environmental impact of collecting food waste may not justify the reduced impact from having food waste in landfills. This should be carefully modelled, as the greenhouse gas (GHG) emissions associated with the collection can be simply estimated through

consultants such as MyImprint (www.myimprint.nz) or similar service providers, and compared with the estimated emissions of composting, landfilling or otherwise.

This may become regulated through the Consultation Document, if implemented, so some thought and future planning should be invested into the feasibility and logistics of this now while there is still time to design the best-case outcome financially and environmentally. If this planning is left too late, the result may be a solution with less desired financial or environmental outcomes.

Kerbside Proposal Three: Comingled Recycling and Glass Collection to Rongotea, Sanson, Halcombe and Himatangi Beach

No comment.

Other:

Currently as the law states, farms in rural Manawatū are allowed to have their own landfill on site. There is pickup of general waste to landfill within a specific distance on all rural properties in the district. However, there is no recycling pickup offered at many of these same pickup points. This would encourage on-farm dumping of recyclable materials and use a finite resource to pick up general waste to be transported to Bonnie Glen landfill, where it should be investigated to whether having a recycling pick-up within a specific distance to each household would have a greater outcome than collecting landfill rubbish

This submission has support from:

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