**Outdoor storage of tyres: reducing environmental risks** – due Wednesday 25th March

MfE Submission Form.

N.B. After initial consideration, Sophie Mander has concluded that although QLDC would be supportive of a regulatory framework for the storage of tyres in outdoor spaces, there is not a significant amount of detail that we are able to provide for an in depth submission. For this reason, I felt it more appropriate to attach the comments made the team to the submission questionnaire form provided by MfE.

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

Yes. The responsibility to minimise storage of tyres, monitor and enforce any discharges and emissions to land, water or air, is more closely aligned with regional council functions under the RMA not district councils.

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

QLDC is supportive of the proposed NES as it provides a regulatory framework to control outdoor tyre storage activity.

Storage of tyres outdoors can pose chronic and acute risks to the local community and the wider environment if not appropriately managed. Development of the NES will enable better management of stockpiles and reduce the likelihood of adverse environmental impacts to air through fire or contaminant migration to soil and water.

The goal of any control should be to safely manage temporary storage of tyres only i.e. tyres that are pending further processing through reuse, recycling or recovery. Long term storage of used tyres should not be permitted due to the risks to the environment.

Questions not answered:

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

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

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

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

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

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

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