



5 February 2020

Via email: LandfillLevyConsultation@mfe.govt.nz

Dear Sir / Madam,

SUBMISSION: REDUCING WASTE – A MORE EFFECTIVE LANDFILL LEVY

Thank you for the opportunity for QLDC to present a submission in relation to proposed changes to the Landfill Levy.

As a high growth council experiencing significant visitor and resident numbers, efficient waste minimisation and management is a high priority. QLDC welcomes initiatives that consider operational effectiveness and provide greater clarity of regulation and critical review points for the sector.

Broadly speaking, QLDC supports the positions taken by both LGNZ and the WasteMINZ Territorial Authority Officers Forum. Additionally, this submission explores points that relate to QLDC specific circumstances and context.

A key point to note is that waste minimisation funding models based on ratepayer numbers disproportionately disadvantage QLDC. The district's residents numbering 39,500 support an average day population of approximately 65,000 people which poses unique waste minimisation challenges. QLDC therefore supports additional investment for small communities and low rate-payer base, high visitor destinations.

Thank you again for the opportunity to comment and should the opportunity arise, officers may wish to speak to this submission. It should be noted that this submission is the position of officers and has not been ratified by full council.

Yours faithfully,



Mike Theelen
Chief Executive

1.0 IN ALIGNMENT WITH THE WASTEMINZ TERRITORIAL AUTHORITY OFFICERS FORUM AND LGNZ

1.1 QLDC believes that there must be consistent regulation, compliance and monitoring of farm dumps and cleanfills with a view to phase out farm dumping as an acceptable practice.

- 1.1.1 There is a lack of data available on both cleanfills and farm dumps, currently allowing only a limited understanding of the scale of these sites and the effects on the wider environment.
- 1.1.2 Consideration must be made for a levy to be imposed on farm dumps once a programme of works is implemented to gain a clear understanding of the number and compliance status of these sites. This is preferable to excluding them from the levy completely.
- 1.1.3 The exemption for farm dumps from the levy system may result in these disposal facilities becoming an avenue to bypass more controlled disposal methods.

1.2 The development of a levy investment plan is welcomed by QLDC as a clear, transparent and equitable tool signalling the relationship between the increase in charges and the allocation of funds over the long term.

- 1.2.1 The proposed levy implementation must be developed in conjunction with an investment plan that prioritises re-think, re-design, reduce, reuse solutions over recovery and recycling activities as solutions to minimising waste.
- 1.2.2 Increases to the landfill levy must align with council long-term plan processes to allow for effective planning. This is particularly pertinent in high population growth areas such as the Queenstown Lakes District where forecast population and visitor growth has significant impact on the provision of services and assets.
- 1.2.3 Council long-term planning and Ministry alignment will support councils to be proactive in their waste minimisation priorities.
- 1.2.4 Community led, local solutions are a vital to achieving waste minimisation goals. However, QLDC requests clear direction from central government on steps being taken to assist manufacturers and suppliers support the same goal. This includes detailed analysis and investment in developing a circular economy for NZ.
- 1.2.5 This should ensure that products are designed for the longest use possible, can be easily repaired, remanufactured or recycled, or used, composted and the nutrients returned to our soils. Any proposed levy investment plan needs to prioritise funding allocations towards the top of the waste hierarchy. This requires the elements of waste hierarchy to be more strongly embedded in all the decision making processes of the Waste Minimisation Act.

1.3 QLDC agrees that a robust, ongoing programme of research and analysis of behavioural change is required as an integral part of the levy investment plan.

- 1.3.1 It is vital to identify the behavioural changes that impact the reduction of waste and the scale of that impact. Partnering this with a focus on the barriers to behavioural change and how to overcome these is a key part of wider waste minimisation goals.
- 1.3.2 Improved data will help inform effectiveness of a wider approach to waste minimisation including behavioural change initiatives. Data is currently focussed on waste activities further down the waste hierarchy. Developing data and measures to support outcomes focussed at the top of the waste hierarchy will in turn guide investment into activities supporting top of the waste hierarchy solutions.

2.0 QUEENSTOWN LAKES DISTRICT FOCUS

2.1 QLDC strongly opposes the phase-in option to increase the rate for municipal landfills before expanding to additional sites – Option A.

- 2.1.1 The time period for increases to the levies for municipal landfills, which is set for July 2020 under proposed option A leaves very little time to include these increases into council budgets.
- 2.1.2 Option A provides no timeframe for the research and implementation of waste minimisation changes, behavioural or otherwise, which may translate into increases in levy avoidance behaviour as no opportunities for waste minimisation will have been provided.
- 2.1.3 A longer lead in would allow for collaboration between territorial authorities to gather baseline data of illegal dumping activity. This will enable a more accurate measure of impacts associated with increases in landfill fees.

2.2 QLDC welcomes a first step towards defining levy increases up to 2023 in the proposed phase-in options, however planned and progressive increases to the levy beyond 2023 need to be signalled.

- 2.2.1 QLDC agrees with the expansion of the landfill levy to include construction and demolition landfills as this waste stream is of significance to the district as a high growth area. QLDC wishes to underline a desire to see investment in diversion and reprocessing infrastructure in the QLDC region.
- 2.2.2 As recommended in Eunomia's 2017 research report and in accordance with LGNZ and the TAO Forum's adopted Waste Manifesto, the landfill levies must reach higher than the proposed \$60. The Eunomia research suggests that to change behaviour, divert waste from landfills, and make alternatives such as recycling, composting and reuse more competitive and trigger real reductions in waste disposal, the levy would need to reach \$140 per tonne.

2.3 QLDC is disproportionately affected by funding that is allocated on the basis of numbers of rate payers within a district. With Queenstown Lakes District hosting an average of approximately 25,000 visitors on a daily basis, increasing the resident population by 63%, QLDC supports additional investment for small communities and low rate-payer bases with high visitor numbers.

- 2.3.1 The rate-payer base of many communities does not accurately reflect the funding support required for waste minimisation activities. Consideration should be given to the additional burden high visitor numbers to a district have on continued waste minimisation targets and funding should be allocated as such.
- 2.3.2 The targeted investment in extensive networks of locally owned and operated resource recovery centres would provide local solutions, build community resilience and move NZ towards its circular economy goals.
- 2.3.3 The levy investment plan needs to create greater flexibility for the Waste Minimisation Fund. The current co-funding requirement makes it very challenging for NGOs to access waste minimisation funds. Industry and commercial enterprises have access to wider resources to co-invest that NGOs don't. The community sector should be better supported to access these funds.

2.4 QLDC requests that clarity is given on the relationship the waste to landfill levy will have with the other emissions legislation such as the Emissions Trading Scheme (ETS).

2.4.1 Clarity is required on whether all landfills subject to waste to landfill levies will also be subject to the ETS.

2.4.2 Consideration should be made for options to consolidate emissions payments related to landfill operation e.g. MfE landfill levy and purchase of emissions units under the ETS.

3.0 ADDITIONAL MATTERS

3.1 QLDC recognises that regulation, enforcement and monitoring activities require consistency across different areas and legislation to minimise levy avoidance behaviour.

3.1.1 Consistency in regulation and enforcement at a regional level will minimise local discrepancies which could otherwise translate into trans-boundary waste migration.

3.1.2 Any review of the Waste Minimisation Act should be closely aligned with the Litter Act for consistency in regulatory process, enforcement and penalties

3.2 Consideration of the impact on charitable organisations and recycling facilities should be taken as well as the inclusion of waste-to-energy incineration plants in the levy system.

3.2.1 The negative impact on organisations receiving second-hand donations should be considered, as these organisations may become an avenue for levy avoidance behaviour.

3.2.2 For reuse and recycling facilities to become a viable financial option, the system should consider support (financial, technological etc.) to reduce levies exacted on by-products, contamination and leftovers produced by these services.

3.2.3 The waste to landfill levy should also be applied to waste to incineration solutions. Waste-to-energy incineration plants would not meet local or national goals of reducing waste production and does not move us towards circular use of resources.

3.3 QLDC would support the consideration of a single point data capture system to capture all material data e.g. reuse, recycling, resource recovery and landfill data.

3.3.1 A single point data capture platform would enable improved efficiencies in data management and facilitate integrated decision making.

3.3.2 Tools in the Waste Minimisation Act need to mandate the gathering of data on reused, recycled and recovered materials including contamination and by-products in recycling processing facilities.

3.3.3 The current option to license operators through local government bylaw regulations is neither efficient nor proving effective. Consistent, comprehensive, mandated national data collection will significantly improve planning and investment at local and national level.