

11 June 2012

Ref: EN10-01

Ministry for Environment
P O Box 10362
Wellington 6143

Re: Proposal to exempt small and remote landfills

1. *Local Government New Zealand* supports the exemption of small, remote landfills from ETS obligations. We acknowledge the need for New Zealand to decrease emissions to reduce the impacts of climate change and to meet international obligations. However, the inclusion of landfill gas emissions in the Emissions Trading Scheme (ETS) failed to take into account the potential for perverse outcomes, particularly for small or isolated communities.
2. In previous submissions to the Climate Change (Waste) Regulations 2010 and the review of the emissions trading scheme (2011), local authorities have expressed concern of the potential for unintended outcomes including:
 - early closure of landfills servicing low population, geographically isolated communities and the costs associated with ongoing management of these landfills, the transport of waste to alternative landfills, and disposal fees at these landfills.
 - an increase in illegal dumping and the associated risk to the environment. Illegal dumping includes farm pits and the disposal of green waste on river beds as well as road side 'fly tipping' or use of rubbish bins provided by local authorities or the Department of Conservation. One of the risks associated with this practice is plant pests. In New Zealand, 75 per cent of plant pests and 50 per cent of freshwater weeds are garden escapes¹. A paper prepared for Cabinet Economic Growth and Infrastructure Committee² (2010) cites the cost of managing existing pests in New Zealand as \$36.9 million for regional councils and \$407 million for the private sector, a total of \$443.9 million.
 - impacts on community support for waste initiatives as solid waste becomes someone else's problem ie disposed of in another district or region and hence invisible to the local community.
 - landfills with very low placement rates often service remote communities. For the NZTA when making decisions on funding and levels of service for the state highway network they use a concept of road user experience. Considerations such as travel time, reliability and safety are a factor in determining the road user experience. The types of issues they are concerned about are additional traffic movement, impact on safety, crash history, and the design and visibility of access.

¹<http://www.doc.govt.nz/getting-involved/volunteer-join-or-start-a-project/know-your-weeds-and-animal-pests/weeds/garden-escapes/>

²MAF *Managing Pests in New Zealand: Discussion Paper and Legislative Changes*.
<http://www.biosecurity.govt.nz/biosec/pol/biosecurity-act-review>

3. The proposed criteria for determining which landfills are exempt are that landfills:
 - began operating before 1 January 2012
 - have an annual placement rate of less than 1000 tonnes of waste
 - are located at a distance of:
 - more than 150 km by road from a 'Class A' landfill with a landfill gas capture system in operation or
 - more than 25 km from the North or South Island, if located on an offshore island of New Zealand.
4. Landfills with very low placement rates often service remote communities and there is potential for unintended outcomes as outlined in bullet 2.
5. *Local Government New Zealand* supports the proposal to exempt small, remote landfills such as Pongaroa landfill (Tararua District) landfills from ETS obligations.
6. We support the criteria as presented noting that landfill operators are not required to meet all of the criteria but that, for example, a landfill which was operating before 1 January 2012 with a placement rate below 1000 tonnes would be eligible for exemption regardless of distance to Class A landfill.
7. *Local Government New Zealand* thanks the Ministry for Environment for the opportunity to comment on the proposal to exempt small and remote landfills from the Emissions trading Scheme.

Yours sincerely



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