



Submission on Proposed Canterbury Land and Water Regional Plan

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Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm Friday 5 October 2012 to:
Freeport 1201 Proposed Canterbury Land and Water Regional Plan
Environment Canterbury
P O Box 345
Christchurch 8140

Full Name: <u>SCOTT ANTONY RHODES</u>	Phone (Hm): _____
Organisation*: <u>ENVIROWASTE SERVICES LIMITED</u>	Phone (Wk): <u>09 622 8472</u>
* the organisation that this submission is made on behalf of	
Postal Address: <u>PRIVATE BAG 92810</u>	Phone (Cell): <u>027 4337443</u>
<u>PENROSE AUCKLAND</u>	Postcode: <u>1642</u>
Email: <u>scott.rhodes@envirowaste.co.nz</u>	Fax: <u>09 636 6561</u>
Contact name and postal address for service of person making submission (if different from above): _____ _____	
Trade Competition	
Pursuant to Clause 6 of Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:	
a) adversely affects the environment; and	
b) does not relate to trade competition or the effects of trade competition.	
Please tick the sentence that applies to you:	
<input checked="" type="checkbox"/> I <u>could not</u> gain an advantage in trade competition through this submission; or	
<input type="checkbox"/> I <u>could</u> gain an advantage in trade competition through this submission.	
If you have ticked this box please select one of the following:	
<input type="checkbox"/> I <u>am</u> directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.	
<input type="checkbox"/> I <u>am not</u> directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.	
Signature: <u>[Signature]</u>	Date: <u>18/9/2012</u>
(Signature of person making submission or person authorised to sign on behalf of person making the submission)	
Please note: (1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.	
<input checked="" type="checkbox"/> I <u>do not</u> wish to be heard in support of my submission; or	
<input type="checkbox"/> I <u>do</u> wish to be heard in support of my submission; and if so,	
<input type="checkbox"/> If others make a similar submission, I will consider presenting a joint case with them at the hearing.	

**Submission to Environment Southland
on
Proposed Canterbury Land and Water Regional Plan**

Introduction

1. This submission is from:
EnviroWaste Services Limited
Private Bag 92810
Penrose
AUCKLAND
2. We do not wish to be heard in support of this submission.
3. The contact person for this submission is:
Scott Rhodes
National Environmental Coordinator
Ph (09) 622 8472
scott.rhodes@envirowaste.co.nz.
4. EnviroWaste Services Limited (ESL) is the second-largest waste company in New Zealand. In conjunction with several of its joint ventures, EnviroWaste owns and operates landfills, recycling and waste transfer facilities. EnviroWaste also provides kerbside refuse and recycling collection services for a number of district and city councils as well as small and large business and industry clients throughout New Zealand.
5. As a company ESL is committed to working proactively in partnership with Councils, Central Government and others to:
 - prevent pollution and enhance standards of the waste industry in New Zealand;
 - promote resource recovery and sustainable waste minimization;
 - achieve environmental improvements; and
 - share environmental expertise.

EnviroWaste's Submission

6. ESL supports Environment Canterbury's Proposed Land and Water Regional Plan (PLWRP). In particular ESL supports the following policies:

- Policy 4.11, in respect of discharge of contaminants to land or to water;
- Policy 4.16, in respect of earthworks, land excavation and deposition of material into land over aquifers;
- Policy 4.24, in respect of hazardous substances, and hazardous activities.

7. However, ESL is concerned that some aspects of the proposed plan, in respect of the disposal of waste to land, are inconsistent with provisions in the Operative Natural Resources Regional Plan (NRRP).

8. The proposed LWRP does not have a definition for cleanfill, whereas the operative NRRP does. ESL suggests that a definition of cleanfill and appropriate rules to allow the deposition of clean, uncontaminated, inert fill materials be incorporated into the plan.

9. The proposed LWRP has an appropriate definition for solid waste. However, the definition used for municipal solid waste is:

Municipal Solid Waste means solid waste collected by a territorial authority and disposed of at a landfill.

10. This is inconsistent with the currently recognized definition of municipal solid waste in the CAE Landfill Guidelines, which is:

Municipal solid waste is any non-hazardous, solid waste from a combination of domestic, commercial and industrial sources. It includes putrescible waste, garden waste, uncontaminated biosolids and clinical and related waste (including contaminated waste sterilised to a standard acceptable to

the Department of Health). All municipal solid waste should have an angle of repose of greater than five degrees (5°) and have no free liquids.

11. As the current definition limits municipal solid waste to that waste only collected by councils, Rule 5.67 and Rule 5.68 apply only to wastes collected by councils and hazardous wastes. Other wastes that would normally be included in a definition of municipal solid waste are only covered by Rule 5.6.
12. ESL suggests that the definition of municipal solid waste be revised to reflect the currently accepted definition above and/or the word "municipal" be deleted from Rule 5.67 and Rule 5.68 so that the rules apply to solid waste, as defined.
13. In summary, ESL supports the Proposed Land and Water Regional Plan, but recommends amendments to some definitions and rules.



Date.....18/9/2012

Scott Rhodes

National Environmental Coordinator

EnviroWaste Services Limited