

# Submission

## Reducing waste: A more effective landfill levy

Submission to: [LandfillLevyConsultation@mfe.govt.nz](mailto:LandfillLevyConsultation@mfe.govt.nz)  
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**Contents**

Contact Details ..... 3

The Forest Owners Association ..... 3

FOA overall comment on proposal ..... 3

    The FOA supports the goals of the proposed levy ..... 3

    The FOA members manage and minimise their own waste ..... 3

    Illegal dumping of household waste is an issue for forest owners ..... 3

    Recommendation..... 4

Appendix - Examples of public waste dumping on FOA Members Land ..... 5



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## The Forest Owners Association

The New Zealand Forest Owners Association Incorporated (FOA) is the representative membership body for the commercial plantation forest growing industry. FOA members are responsible for the management of approximately 1.2 million hectares of New Zealand's plantation forests and over 80% of the annual harvest.

In 2019, the forest growing sector was worth \$6.93 billion in export value and has a 12% share of rural land use.

## FOA overall comment on proposal

### The FOA supports the goals of the proposed levy

The FOA supports in principal the goal of the waste minimisation levy and the reasoning behind increasing the levy to deter the generation of waste, to make alternative options more economically viable and to fund waste minimisation efforts. We absolutely support the need to minimise waste finding its way to landfill to avoid imposing costs on the environment that future generations will need to manage.

### The FOA members manage and minimise their own waste

Our members through their business of growing and harvesting trees do not generate significant volumes of waste. Due to the limited range of materials disposed of, the majority can be reused or recycled. Those of our members that are certified to Forest Stewardship Council® are required to ensure that waste produced by their contractors is managed and where possible recycled. The FOA absolutely supports the need for ongoing initiatives to minimise production of unnecessary waste and improve management to increase effective recycling in New Zealand.

### Illegal dumping of household waste is an issue for forest owners

A key issue for FOA members is the potential for an increase in illegal dumping as a result of increasing the levy. Due to the location and scale of forest owners land holdings most forest owners experience significant difficulties with illegal dumping, with forest entrance gates off public roads, public road verges and areas of forest near to settlements being particular hotspots for dumping.

Waste encountered ranges from small items such as takeaway wrappers thrown from cars and household rubbish through to discarded furniture, whiteware and abandoned cars. This dumping creates a significant cost on the environment with material strewn over large areas, and a very material cost for those involved in cleaning up and correctly disposing of this material. Forest owners generally coordinate with local councils in the management of such waste, but often bear the cost of clean-up and disposal.

Illegal dumping has always been an issue, but unquestionably landfill levies play a part in incentivising this behaviour to avoid paying landfill charges. A proposed increase in the levy will potentially exacerbate this problem.

The FOA notes that the discussion document does briefly address the issue of illegal dumping and notes that illegal dumping can be addressed through the RMA. We question whether the RMA is an effective mechanism for achieving this, given it is not clear whether rules alone will be effective in reducing this problem. The key issues are measures to monitor and enforce such rules and clean up the resulting problem.

Of note on page 40 the discussion document identifies 'measures to combat inappropriate forms of disposal (litter, fly tipping, illegal dumping)' as a priority area for investment. The FOA supports this measure and believes it is absolutely critical to ensuring good environmental outcomes. Otherwise the levy is potentially diverting waste from properly designed landfills to the general environment. Of note on page 41 of the document it also states that 'funding should primarily be discrete rather than ongoing'. Clearly to be effective measures to address illegal dumping must be consistent and ongoing, not just short-term initiatives.

Some FOA members have had some experience with councils engaging litter officers to check on illegal dumping, going through waste to identify the perpetrators where possible and undertaking legal action and also arrange collection and correct disposal of the material in the past. While this is under way it was found to be effective, however funding shortages often mean these roles are not maintained over the longer term.

## Recommendation

If the levy is to be increased as proposed, the FOA requests that:

- Specific measures are included to manage the issue of illegal dumping, including a requirement for territorial authorities to monitor, address and clean up waste illegally dumped on public and private land by the general public.
- Some of the funding collected be available for this purpose in recognition that landfill charges are a contributing factor to illegal dumping.

Thank you for the opportunity to comment on the proposal.



Sally Strang, Chair, FOA/FFA Forest Resources and Environment Committee

Appendix - Examples of public waste dumping on FOA Members Land



