

29 August 2018

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Dear Angie

Feedback on the draft Waste Management and Minimisation Plan 2018-2024

Thank you for the opportunity to comment on the Council's draft Waste Management and Minimisation Plan 2018-2024. Environment Canterbury supports the direction of the draft Plan as set out in the Goals, Objectives and Actions.

Waste is an important region wide issue in Canterbury. Waste management services and minimisation projects that address multiple waste streams, including urban, rural and commercial waste are therefore important. Environmental, social, economic and cultural effects can occur at any stage of the waste stream, and a robust, integrated framework is required to ensure any effects are minimised at all stages of waste management.

We recognise the effort your Council has taken to develop and record waste management, minimisation and diversion systems, including but not limited to, the three-bin system operating in the urban centres of the Mackenzie District. It is evident that past management systems, such as the three-bin system have enabled measurement, recording and identification of key waste streams in the Mackenzie District.

The focus of the Plan on waste minimisation is consistent with both Objectives 19.2.1 and 19.2.2 of the Canterbury Regional Policy Statement (CRPS). This approach, supported by the goals and objectives of the Plan also promotes alignment with the CRPS Waste Minimisation Policies. For example, Goal 1 and associated Objectives may compliment CRPS Policies 19.3.1 and 19.3.2 where waste minimisation could be reduced at the source, through the use of the '5Rs'.

We support the inclusion of the actions geared around understanding the waste needs of the Mackenzie District rural communities to identify new and alternative rural waste disposal and diversion opportunities in particular –

- Consideration of alternative waste diversion and disposal opportunities for plastic bailing wrap, rubber and some building materials, given that the Canterbury Air Regional Plan contains rules that do not provide for the burning of these materials. Further consideration of alternative waste diversion and disposal opportunities for these materials could highlight sustainable farm waste options available to the farming community and also give greater effect to the CRPS, Objective 19.2.2.
- The use and management of farm rubbish pits is captured within the Farm Environment Plan process. Farm rubbish pit installation and use can be a Permitted Activity under certain conditions through the Land and Water Regional Plan. Assessment of what farm waste is disposed of through farm rubbish pits, and how these materials could continue

to be disposed of, re-used or diverted at the source may compliment the Farm Environment Plan process and promote improved compliance, while giving greater effect to the CRPS, Policy 19.3.3.

We look forward to continuing to work together to promote waste minimisation, management and diversion within the Mackenzie District, while also furthering the development of strong working relationships with our Contaminated Land and Planning Teams at Environment Canterbury.

Environment Canterbury does not wish to be heard in support of this submission.

Yours sincerely

A handwritten signature in black ink, consisting of a large, stylized 'A' followed by a horizontal line that tapers to the right.

Andrew Parrish
Regional Planning Manager