

## Discussion of Strategy Targets

In the following paragraphs the Strategy targets (in italics) relevant to the Council are outlined. Their implications for the Council and possible responses are explained below each target. At this stage some of these responses represent possibilities rather than definitive actions as the best form of response may not yet have been determined.

### (a) Waste Minimisation

- (i) *Local authorities should report in their annual reports on their waste minimisation and management activities from 2001-02.*

It is assumed that this target refers to the waste produced and minimised by the Council itself. It should be possible for the Council to report progress on its waste minimisation actions, although this possibility has not been looked at before. We are currently reviewing the Council's annual report format and contents, as well as reassessing the internal actions the Council needs to take to be more sustainable. Existing environmental management systems in the Council do cover this to some extent. This target will be included in those reviews.

- (ii) *The Regional Council will ensure that a waste minimisation and management clause is included on all new/renewed industrial resource consents by 2005 and provide an annual update on the percentage of consents that have such a clause:*

This is not something we have the power to do under current legislation (the Resource Management Act 1991).

- (iii) *The Regional Council will have in place a waste minimisation strategy by 2005.*

This is under consideration (see (i) above). Waste minimisation is included within the Environmental Management Systems in place in parts of the Council. Implementation across the Council, however, is patchy, and a more thorough going approach is needed.

- (iv) *The Regional Council will ensure that at least 25 percent of all existing industrial resource consent holders have in place a recognised waste minimisation and management programme.*

Once again, this target cannot be achieved by regulatory means. It is intended that the *Take Charge* programme will include the promotion of cleaner production and waste minimisation in due course. This could be the means by which we encourage businesses to use resources more efficiently (this cannot be done in a regulatory under current legislation). At present, however, the implementation of *Take Charge* is constrained by the need for staff to respond to pollution call-outs. Our priority for now is to ensure the programme is operational at the basic level of ensuring businesses comply with their pollution control responsibilities, and this is what we are working to achieve.

**(b) Contaminated Sites**

- (i) *By December 2008, all sites on the Hazardous Activities and Industry List will have been identified and 50 percent will have been subject to rapid screening system in accordance with Ministry guidelines.*
- (ii) *By December 2010, all sites on the Hazardous Activities and Industry List will have been subject to a rapid screening system in accordance with Ministry guidelines, and a remediation programme will have been developed for these that qualify as high risk sites.*
- (iii) *By December 2015, all high risk contaminated sites will have been managed or remediated. A timeframe will also have been developed to address the management or remediation of remaining sites.*

The legal responsibility for the management of contaminated sites rests with landowners/occupiers. There is no specific function for regional councils under the RMA, although enforcement action could be used as a measure to ensure that landowners comply with the requirements (where there is a discharge causing adverse effects).

Nonetheless, the Council has already carried out some work on contaminated sites. We have taken a proactive approach in identifying sites that may be contaminated and some successful cleanup work of specific sites has been carried out to ensure they are safe. Some 1400 sites have been identified on our Contaminated Sites Register. The register includes the “rapid screening system”, and this will be applied to all sites on the register in due course. It is therefore possible to meet this target, however, additional resources may be required to develop a more complete understanding of the nature and extent of the contaminated sites on our database, and find those not currently included.

It should be noted that these contaminated sites targets will require a close working relationship with territorial authorities to complete the register of sites and remediation programmes. Considerable thought has already been put into how we could meet these targets and a draft programme for the next four years is being developed to identify what is needed.

The Council needs to reassess its role in the remediation of high risk sites, particularly since the RMA gives no clear function in this respect.

**(c) Hazardous Waste**

- (i) *By December 2004, hazardous wastes will be appropriately treated before disposal at licensed facilities, and current recovery and recycling rates will be established for a list of priority hazardous wastes.*

This ambitious target is directed primarily at territorial authorities, as the responsibility for hazardous substances under the RMA lies with them. The Council's responsibilities under the Act are to monitor the effects of hazardous substances on the environment and to ensure compliance with resource consents.

However, the Council can make a contribution to the achievement of this target through such actions as the unwanted agri-chemical collection currently under way in rural parts of the Region.

**(d) Waste Disposal**

- (i) *By December 2005, all cleanfills will comply with cleanfill disposal guidelines.*
- (ii) *By December 2010, all substandard landfills will be upgraded or closed.*
- (iii) *By December 2020, all substandard wastewater treatment facilities will be upgraded, closed or replaced with systems that comply with all relevant regional and coastal plans, standards and guidelines.*

The onus for meeting these targets rests largely with the operators and councils responsible for them. For the Regional Council, there are technical difficulties in meeting these targets at this stage. While guidelines have been produced by the Ministry for the Environment, there is no definition for what is or is not a 'substandard' operation. It is inferred that if cleanfills and landfills do not meet the guidelines then they are "substandard". If this is the case, then we would have difficulty meeting the targets.

For example, in regards to a wastewater treatment plant, would secondary treatment be considered substandard or would it be necessary to have tertiary treatment only. Work still needs to be carried out in defining appropriate standards and until such time as this information is available the Regional Council can only ensure that compliance with existing consents is met.