

RUSSELL PROTECTION SOCIETY (INC)

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Ministry for the Environment
Climate Change Team
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NZ Emissions Trading Scheme – Submission to Exempt Russell Landfill

It is submitted that the Russell Landfill qualifies for an exemption to the penalties imposed by the NZ Emissions Trading Scheme (NZETS) because it is small (200 tonnes per annum) and isolated (located on Russell Peninsula and accessed by vehicle ferry).

Further, in response to the submission questions we note:

Do you think that exempting landfills that service remote, less economically robust communities is warranted?

Yes. The Russell Community is an isolated, low income area where the median income is roughly \$23,000 per annum according to the last NZ Census data. We lack many basic services and because of its remote location it is relatively expensive to live there. Many people in the Community would not be able to afford increased charges for waste disposal.

What do you think would be the likely impacts of granting or not granting an exemption (including costs and benefits)?

The Russell Community has invested heavily in its local landfill. For instance, leachate from the landfill is captured and treated through the Russell Sewerage Scheme. The landfill is regularly capped with soil in order to reduce the amount of emissions and leachate.

Most people do not have kerbside collection and instead transport their own rubbish to the landfill where it is hand sorted. Russell has the highest rate of recycling in Northland. There is no industry in the area and hence no trade waste to be disposed of. Sewage sludge is not dumped in our landfill. Local residents have worm farms to dispose of kitchen waste.

These benefits outlined above would be reduced if the landfill were to be closed. The environmental costs and emissions created by trucking waste off our Peninsula and down to either Whangarei or Auckland would be significant and would rely on increasingly expensive fossil fuels. If additional charges were to be levied instead, then the rate of illegal dumping and trash burning would increase because of our isolated location.

What is your assessment of the risk of adverse environmental effects outlined?

The Russell Community currently has a number of incentives to reduce its waste stream, as outlined above. It has a well run landfill that is managed within a controlled environment. The volume of emissions created is currently very low, however closing the landfill or imposing additional charges could have the effect of upsetting this balance and result in additional emissions being created, contrary to the purpose and spirit of the NZETS.

Russell has a strong community spirit and many people volunteer their time and donate money towards creating a locally sustainable environment. The Community is adamant that it wishes to take responsibility for disposing of its own waste and has invested heavily in a local sewerage scheme and well-run landfill.

One option that we wish to explore is to plant trees at the landfill as a way of both beautifying the area and earning carbon credits to offset any emissions created. We note that this is entirely consistent with the purpose of the NZETS, which states that “The ETS puts a price on greenhouse gases to provide an incentive to reduce emissions and encourage tree planting”. It is submitted that exempting the Russell Landfill is entirely consistent with the purpose of that legislation.

Are there alternatives to providing an exemption?

It is considered that where there are small, isolated landfills serving lower-income communities that the alternatives would either be to provide subsidies to fund the penalties arising from the NZETS or, as suggested above, to promote local tree planting and facilitating the granting of credits from this to offset the cost of any penalties.

Do you consider the exemption criteria proposed are appropriate and fit for purpose?

The suggested criteria should acknowledge unique situations such as Russell, which is essentially a “mainland island” that is dependent on water transport. The criteria should also be more flexible in acknowledging that some small landfills are able to promote greater levels of recycling and recovery, particularly where there is limited kerbside pickup, and that the waste stream in those instances can create very low levels of emissions. It is further noted that no mention in the criteria is made of possible local initiatives such as tree planting, which can have the effect of either reducing or totally eliminating carbon deficits.

The Russell Protection Society wishes to support the Far North District Council in its efforts to gain an exemption for the Russell Landfill.

signed

Date 10 June 2012



Bob Drey
Chairperson
Russell Protection Society