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19th May 2023

Grey District Council
P O Box 382
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Dear Sir/Madam

Submission on GDC Annual Plan 2023/24

Thank you for the opportunity to provide comment on the Grey District Council's Annual Plan for 2023/24. The West Coast Regional Council's (WCRC or the Council) submission is attached.

The Council consulted with their iwi partners, Te Rūnanga o Ngāti Waewae and Te Rūnanga o Makaawhio (Poutini Ngāi Tahu or PNT), who are mana whenua on the West Coast/Tai Poutini, in the development of this submission.

This submission is specifically on the proposal to either set fees at the landfill gate, or a rate increase to cover the cost of greenwaste disposal at the McLeans Landfill and Resource Centres.

Our contact details for service are:

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The WCRC would like to speak in support of our submission at a Grey District Council hearing on 30 May.

We would be grateful for acknowledgement of receipt of our submission.

Yours faithfully

A handwritten signature in black ink, appearing to read 'H. Mabin', with a long horizontal flourish extending to the right.

Heather Mabin
Chief Executive Officer

West Coast Regional Council Submission on Grey District Council Annual Plan

Introduction

The West Coast Regional Council (the WCRC or the Council) appreciates the opportunity to submit on the Grey District Council's (GDC) Annual Plan proposal to either set fees at the McLeans Landfill and Resource Centres, or a rate increase, to cover the cost of greenwaste disposal at the McLeans Landfill.

Te Rūnanga o Ngāti Waewae and Te Rūnanga o Makaawhio (Poutini Ngāi Tahu – PNT) are mana whenua of Te Tai o Poutini (the West Coast). The WCRC's Mana Whakahono ā Rohe (Resource Management Act – Iwi Participation Arrangement) captures the intent of the WCRC and Poutini Ngāi Tahu to progress our relationship in accordance with the Treaty of Waitangi partnership between iwi and the Crown. Poutini Ngāi Tahu were asked if they wanted to have input into this submission. Te Rūnanga o Makaawhio agree with the WCRC's concerns.

The GDC submission form on the 2023/24 Annual Plan asks submitters if they prefer one of two options to raise income for greenwaste disposal. The WCRC does not support Option A: "A processing fee of \$100 per tonne with an additional Green Waste Charge of \$60 per tonne will be implemented at McLeans Pit Landfill and Resource Centres". This submission explains our reasons for not supporting Option A.

About the submitter

Our region's biodiversity, productive land uses and recreational areas are threatened by pest plants which can take over pasture and horticultural areas, choke lakes and collapse forest canopies. With many pest plant species in our region, controlling these is a huge job. Many of these pest plants are considered undesirable with some requiring a national response and many best dealt with on an individual property basis.

The West Coast Regional Council (WCRC or the Council) is required under the Biosecurity Act 1993 to prepare a Regional Pest Plant Management Plan (RPPMP) outlining plants that are considered to be pest plants in the West Coast Region, and how they will be controlled. The Plan has enforceable rules that target specific pest plants for eradication, progressive containment or sustained control in the region.

WCRC employs a Biosecurity Officer to implement and enforce the RPPMP. The Biosecurity Officer is involved with:

- Pest plant exclusion programmes to prevent the establishment of pest plants in new areas. Pest plants that are not present in the region continue to be excluded due to the significant risks they pose to our natural environment, or production values. This means monitoring potential sites and making sure these species do not become established.
- Eradication programmes to reduce the infestation level of the pest plant to zero levels in an area in the short to medium term. This includes working with communities and other stakeholders to completely eradicate small, or manageable enough, incursions from the region over time.
- The Progressive Containment Programme is to contain or reduce the geographic distribution of the pest plant to an area over time.
- The sustained Control Programme provides for ongoing control of the pest plant to reduce its spread to other properties and impact on environmental or production values.

Submission points

From a biosecurity perspective, having a disposal charge at the landfill gate for green waste will have a perverse outcome of increasing the occurrence of roadside 'fly dumping'. A common scenario would be where a property owner has greenwaste to remove from their property which knowingly or unknowingly has a pest plant amongst the waste. They see the landfill fees are too expensive for them or they don't want to pay them, and they drive into a remote rural area (which would be nearby in many cases) and dump their greenwaste in the bush.

Our Biosecurity staff have noticed an increase in 'fly dumping' in the Buller District following the Buller District Council setting or increasing their landfill/resource centre gate fee for greenwaste disposal. Staff understand that this pattern has also occurred in other regions.

There are also a number of commercial property maintenance contractors in the Grey District who remove greenwaste for property owners. Under Option A, they would have no choice but to pass this cost on to their clients, who may ask the contractor to 'dump it up the road', putting the contractor in a difficult situation if the greenwaste contains pest plants.

Increased 'fly dumping' will likely result in an increase in the establishment and spread of pest plants. An increase in 'fly dumping' of greenwaste in the Grey District would in turn increase biosecurity inspection work by having to respond to more complaints received or notifications about 'fly dumping', and compliance and remediation costs incurred by the WCRC.

Furthermore, it will likely result in pest plant spread escalating beyond our control as illegal weed dump sites can be hard to find and have often resulted in pest plant spread further afield prior to their discovery.

Option B seems to be a significant rate hike of approximately \$8 per household, but it would not give residents the option of opting out and dumping illegally, which carries a greater risk of pest plant spread.

Recommendation

That the GDC chooses Option B, to increase the General Rate, to cover the costs of greenwaste disposal, as it carries less risk of increasing the occurrence of illegal 'fly dumping'.

This ends our submission.

