



**National Council of
Women of New Zealand**

Te Kaunihera
Wahine O Aotearoa

National Office
Level 4 Central House
26 Brandon Street
PO Box 25-498
Wellington 6146
(04) 473 7623
www.ncwnz.org.nz

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**Submission to the Ministry for the Environment on the Discussion paper:
Towards a New Zealand Definition of Hazardous Waste**

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 46 nationally organised societies. It has 36 branches spread throughout the country to which women from some 150 societies are affiliated.

This submission is made by the nucleus group of the Environment Standing Committee on behalf of members of NCWNZ, and is supported by previous submissions made on this topic, notably in 1996 on contaminated waste management and in 1999 on managing hazardous waste.

This is a preliminary draft of the definition of hazardous waste and as such lacks detail in parts. However the document appears to have made a good start and recognised all the areas that will need to be developed further. We wish to emphasise the following points.

Section 2: New Zealand definition of hazardous waste – purpose and key principles

This makes good points about the need to be New Zealand specific and cover ALL hazardous waste streams generated within New Zealand. Crucial to the on-going success of the programme is consistent record keeping and the development of a classification system. Support should be given for the definition of the term 'waste' based on the inclusionary definitional approach (p.11). Any hazardous waste list also needs to be inclusive and have clear industry links i.e. which industry/process will produce which type of waste. We would query who decides on the 'bottom line' of the definition, and ask whether 'hazardous' in terms of ecotoxicity includes potential bioconcentrations of trace metals along the food chain. We commend the mechanisms for hazardous waste definition on p13, and suggest that the hazardous characteristics thresholds should be further developed and standardised (p14). It is important to establish who sets the thresholds and how their validity will be monitored. It should be kept in mind that because substances behave differently as mixtures, that thresholds for specific mixtures should be established as well as for the components. Record keeping is a crucial part in monitoring the production and disposal of hazardous waste. Such record keeping should be mandatory and records audited regularly. Neglect of duty should be discouraged.

Section 3: Draft New Zealand definition of hazardous waste.

We support the suggestion that all waste exceeding specified thresholds should be defined as hazardous (p17), and strongly support the idea that no waste be exempt from the hazardous waste list based on dilution or mixing (p21).

Section 4: Hazardous waste classification.

We wish to emphasise the need for a clear and unambiguous audit trail within the mandatory record keeping. No one should be exempt unless their waste production is deemed to be below the threshold. The onus of proof for this should lie with the manufacturer. Anomalies in the system can be avoided by requiring all hazardous waste to be recorded no matter which Act covers it (p26).

In general this is a clear and well set out discussion paper.

Barbara Glenie
National President

Barbara Arnold
Convener, Environment Standing Committee

