

# Illegal Dumping of Waste in the Taranaki Region 2014

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## Executive summary

The earlier report, *Illegal Dumping of Waste in the Taranaki Region 2012*, outlined the background to the issue of illegal dumping (also known as fly tipping). It also reported on the results of the 2011 – 2012 investigation into what records of illegal dumping of waste were kept by the various organisations around the region.

The three district councils, New Plymouth District Council, Stratford District Council, and South Taranaki District Council, along with the Taranaki Regional Council, the Department of Conservation and the NZ Transport Agency are the main organisations that deal with illegal dumping of waste in Taranaki.

The 2011-2012 investigation established that the collection of information was sparse outside the four councils. The report recommended repeating the investigation in two years' time in order to compare levels of dumping, establish trends, and allow for future comparisons.

A meeting of all the agencies in February 2013 agreed to collect a further year of data, from 1 January to 31 December 2013, to endeavour to quantify the number of illegal dumping events and the volume dumped. This meeting also agreed that an enforcement campaign was a good idea, and that any resulting prosecutions would be useful for public education.

A more complete picture is now available as a result of the information collected for the 2013 calendar year. Each of the councils and NZTA provided data on the number of events; and the councils have provided estimates of volumes. However, there was still inconsistency in how information was collected between (and within) agencies.

The total number of events recorded for Taranaki during 2013 for agencies which provided this information (five of the six) was 249; and the total volume reported (by four of the six agencies) was 967m<sup>3</sup>. NZTA did not specifically record illegal dumping on or around state highways prior to the meeting in February 2013, and thought it only occurred occasionally. Since then, they have discovered the extent of the problem (84 events recorded).

The number of events per capita by district, including records from TRC and NZTA, was highest in the New Plymouth District area, considerably less for the Stratford area, and lowest for the South Taranaki area. While the data is more complete now than it was in the 2012 report, until all agencies record the number of events it is not possible to know if there is actually a difference in the total number of events per district, or if more waste is being illegally dumped on to DOC land in the districts where illegal dumping reported to councils and NZTA is lower.

Illegal dumping often occurs at locations where people can easily throw material out of a vehicle without being seen. Sometimes these locations are remote, but not always. For example, DOC reported that conservation areas in close proximity to small rural communities and on the edge of New Plymouth are the worst affected. Bagged rubbish is also left by rubbish bins at parks, reserves and rest areas.

Some of the more remote sites have attracted illegal dumping over many years and continue to be an issue.

The events investigated by TRC tend to involve larger volumes than those reported to the other agencies, and are often on private land.

Where illegally dumped rubbish needs to be removed this is usually undertaken by the agency which administers the land, or their contractors. In some cases, the perpetrators are instructed to remove or bury the illegally dumped material.

Agency staff or contractors may check the rubbish to see if those responsible can be identified. If so abatement or infringement notices may be issued.

One agency, STDC, used a security camera at an area where illegal dumping was regularly occurring. Six infringement notices were issued as a result, and the problem dumping reduced. No other sites in the region have so far been identified as suitable for camera surveillance.

A meeting of all the agencies was held in May 2014 and agreement was reached that it would be useful to continue data collection, and that all agencies would use a standardised reporting process for illegal dumping. This will be helpful for future comparisons after any actions are taken.

Agreement was also reached on a collaborative regional campaign of education and enforcement, to be launched in September to coincide with Keep New Zealand Beautiful week and with the combined Councils' Waste Minimisation Education Strategy's annual awareness campaign, which this year is focusing on illegal dumping and littering.

It is recommended that

1. The regional group, comprising the four councils, DOC and NZTA, continues to meet regularly to set in place the infrastructure, education and reporting framework needed for the regional campaign to reduce illegal dumping.
2. Information on illegal dumping continues to be collected for the duration of this regional campaign in order to measure any effects of the campaign and establish any trends.
3. The duration and nature of the campaign is reviewed annually based on observed impacts.

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# 1. Introduction

## 1.1 Background

The earlier report, *Illegal Dumping of Waste in the Taranaki Region 2012*, outlined the background to the issue of illegal dumping (also known as fly tipping). In summary, the significant changes in the way solid waste has been managed over the last 20 years and the associated increases in the cost of waste disposal were seen to be at least partly responsible for a perceived increase in illegal dumping, as some residents attempt to avoid disposal costs and/or the inconvenience of transporting waste to an approved disposal facility.

The main organisations dealing with illegal dumping of waste in Taranaki are the Department of Conservation, the NZ Transport Agency and the four councils (New Plymouth District Council, Stratford District Council, South Taranaki District Council and the Taranaki Regional Council).

For the earlier investigation, these organisations were asked to provide all information they had relating to illegal dumping events that occurred during the twelve months from 1 May 2011 to 30 April 2012. As far as was known, no similar data gathering exercise had occurred in the region prior to this.

It was found that the collection of information on the extent of illegal dumping was sparse outside the district councils and the regional council, and that it was not collected in a format that made it easy to access for this particular purpose. In spite of this, based on the information provided, it was likely that the greatest amount of illegal dumping was occurring on Department of Conservation land, but the extent of the problem was unable to be determined as detailed information was not recorded. No information on illegal dumping was collected by NZ Transport Agency at that time.

The report recommended repeating the investigation in two years' time in order to compare levels of dumping, establish trends, and allow for future comparisons.

The 2012 report was followed by a meeting in February 2013 of all the agencies to discuss possible actions. Agreement was reached to collect a further year of data, from 1 January to 31 December 2013, in a consistent format to endeavour to provide information on the number of illegal dumping incidents in the region and to quantify the total volume of waste dumped illegally on an annual basis.

Following the meeting, a media release focused on encouraging people to report any dumping that they see was prepared as part of an initial education campaign. This was picked up by one of the local papers.

The meeting also agreed that the use of enforcement as a deterrent was a good idea, and that any resulting enforcement would be useful for public education. TRC Inspectorate officers were to liaise with the other members of the group to identify sites where cameras could be set up to detect offenders with the intention of being able to infringe/prosecute under the RMA depending on the potential effects on water and other public interest considerations. Mt Messenger was mentioned as a possible site.

Enforcement under the RMA carries greater penalties than that under the Litter Act and can result in higher fines. Hence enforcement in response to non-compliance under the RMA would offer greater deterrence to the public as part of a wider education campaign.

The possibility of focusing on specific rural communities was also raised, but it was decided that initially the effort would be broader than this.

A further suggestion was made of erecting a sign to indicate that a camera might be operating as this has been known to deter offenders.

The problems associated with illegally dumped waste remain as described in the 2012 report (TRC, 2012):

This waste has the potential to contaminate soil and waterways and attracts vermin if not removed in a timely manner. Illegal dumping also imposes a potentially significant cost on the landowner for removal. Landfill charges and transport costs are incurred and in addition waste is often dumped in remote locations and over steep banks which adds to the difficulty of removal and therefore the cost.

## **1.2 Purpose**

The purpose of this follow up to the initial investigation was to indicate the number of incidents and the volume of waste dumped illegally over a year, and to also determine the types of waste and locations of illegal dumping. Essentially this would indicate the extent and potential effects of this unauthorised activity. Data was collected in the same format across agencies and was collected monthly.

In addition, if this information is collected regularly and in a consistent format across agencies, any patterns in illegal dumping over time should be able to be seen: e.g. is it increasing or decreasing? This would be especially useful if a regional campaign to reduce illegal dumping was implemented.

It was also hoped the information would help with decisions on future actions that might be taken to reduce the amount of illegal dumping.

## **1.3 Definition**

For the purposes of this investigation illegal dumping is the depositing of solid waste at a location other than a legally acceptable facility. In general, small volumes such as a take away container were considered to be litter and were not included.

## **1.4 Regulatory environment and enforcement**

A number of Acts can apply to illegal dumping including the Resource Management Act 1991, the Litter Act 1979, the Health Act 1956, the Local Government Act 2002 and the Conservation Act 1987.



Councils can create bylaws which apply to illegal dumping under various Acts including the Local Government Act 2002. A bylaw is a rule or regulation which affects the public, orders something to be done, or something not to be done, and is accompanied by some form of penalty for failing to comply. NZTA and DOC also have the power to create bylaws related to illegal dumping.

NPDC and DOC have a Memorandum of Understanding that contaminants on esplanade reserves (as defined in the Regional Coastal Plan) are the responsibility of NPDC.

DOC can issue infringements under the Conservation Act 1987, (S39 (3)), but they are not resourced to do this. DOC has only ever had one successful case in Taranaki of costs to clean up dumped rubbish being borne by the offender.

The Acts most commonly used for enforcement action for illegal dumping are the RMA 1991 and the Litter Act 1979. The Litter Act 1979 covers dumping on any public or private land. The RMA 1991 can be used for any land where material may enter water (S15(1)(a) and (b)). A summary of relevant powers and likely actions taken by enforcement agencies under each of these Acts follows.

#### **Resource Management Act 1991**

The TRC's power to take action relating to illegal dumping comes from the RMA 1991, and specifically relates to unauthorised discharges of contaminants into water or that may enter water; discharges into the coastal marine environment; or air discharges of contaminants (including odour).

Enforcement action under the RMA is summarised in section 5.9 of the Office of the Auditor-General's report on managing freshwater quality (OAG, 2011):

"A regional council can choose to respond to non-compliance by informal means, such as issuing a warning or working with the consent holder or other alleged offender to educate them and bring about compliance. The RMA also provides formal enforcement tools for regional councils to use if the RMA, its regulations, or regional plan rules are breached, or if the conditions in a resource consent have not been complied with. These enforcement tools include:

- Abatement notice – this is served by a council and directs a person to cease an activity that is adversely affecting the environment. Failure to comply with an abatement notice can result in fines or imprisonment.
- Infringement notice – this is issued by a council enforcement officer if they observe, or have reason to believe, that a person is committing an infringement offence. Infringement fees range between \$300 and \$1,000.
- Enforcement order – this is issued by the Environment Court. Any council or member of the public can apply directly to the Environment Court for an enforcement order. It also allows the council to recover clean-up costs from the polluter.
- Prosecution – a council can prosecute an alleged offender, which can result in the District Court imposing a penalty. Penalties can include restorative justice, a fine of up to \$300,000 or a term of imprisonment for up to two years for a person, or a fine of up to \$600,000 for a company."

The RMA provides council with discretion as to how and when to use informal or formal responses to non-compliance. Procedures and guidelines such as the Taranaki Regional Council Enforcement Provisions and Procedures as well as the Solicitor-General's Prosecution Guidelines inform the decision making around response to non-compliance under the RMA. Unfortunately it is not straightforward as many factors may influence the outcome.

### Litter Act 1979

District councils can issue infringement notices for illegal dumping under section 13 of the Litter Act 1979, as long as the appropriate resolution has been passed. Infringement notices impose a fine up to a maximum of \$400.

NPDC and STDC issue infringement notices under the Litter Act; in addition, STDC has a Litter Infringement Policy, available on its website, [www.southtaranaki.com/Council/Policies/Litter-Infringement-Policy/](http://www.southtaranaki.com/Council/Policies/Litter-Infringement-Policy/) (accessed 3 July 2014). Extracts from this policy follow:

*"Council's role and responsibility*

Every Territorial Authority is responsible for the enforcement of the Litter Act 1979. Therefore it is the role of the Council to monitor the District for litter dumping, act on complaints and infringe those responsible for litter dumping."

*"Requirements of the Act*

The Litter Act 1979 provides for the issuing of infringement notices up to a maximum of \$400 for any offence as specified under Section 15(1) of the Act. The Act also provides notices for occupiers to clear private land of litter (Section 10), and fines on conviction through court proceedings."

**Table 1** below outlines the infringement notices for different levels of littering (by definition this includes illegal dumping) in the South Taranaki District. The Council reserves the right to prosecute offenders in respect of any breaches of the Litter Act 1979.

**Table 1** Types of littering offences requiring infringement fees in STDC

<b>Fine</b>	<b>Descriptors for typical offences</b>
\$100	Depositing litter of less than one litre by volume. Examples: a takeaway container or contents of an ashtray.
\$200	Depositing litter from one to 20 litres by volume. Examples: roadside dumping of a 1.5 litre plastic container, or placing household rubbish bags or accumulated car waste in public litter bins.
\$300	Depositing litter from 20 to 120 litres by volume. OR Depositing any litter in a Council park or reserve. Examples: roadside dumping of small volumes of household or green waste, or of any pest plant material
\$400	Depositing litter of more than 120 litre by volume. OR Depositing of Hazardous litter. Examples: dumping commercial waste, dumping of disposable nappy[s], car parts or glass, e-waste, animal remains or anything that has a hazardous chemical residue.

NPDC's infringement fines follow a similar scale. Information about litter infringement and fines is available on its website:

[www.newplymouthnz.com/CouncilAtoZ/Litter.htm](http://www.newplymouthnz.com/CouncilAtoZ/Litter.htm)

SDC does not have an infringement regime or a specific litter bylaw, and does not issue infringement notices. Offenders caught in the act are directed to "pick it up and either take it away or put it in a bin". Litter is mentioned in its Bylaws (SDC, 1993), chapter 9, under the heading Nuisances:

901 DEPOSIT OF REFUSE, ETC.

901.1 No person shall deposit, or permit or suffer to be deposited, or to accumulate any refuse or litter as defined in the Litter Act 1979 or rubbish of any description including sawdust, plastics materials, waste paper, shavings, filth, tins, glass, rags, straw, garden refuse, tree cuttings, iron, or steel on any land not being a place set apart for such purpose by the Council, unless in so doing he takes sufficient precautions to prevent the creation of a nuisance or anything offensive or likely to be injurious to health.

*Example of actions taken by a district council (STDC) after an incident is reported*

Infringement notices are sent if the offender can be identified.

In addition to the fine, the infringement notice also includes a time period for the offender to remove the dumped material. If this is not done, STDC arranges removal and charges the costs to the offender.

*Prosecution under the Litter Act*

The cost to prosecute may be significant, e.g. the single prosecution taken by NPDC in the last two years cost Council \$6000, and resulted in a fine of \$2000. Despite the expense, prosecution may be necessary as part of any campaign to reduce illegal dumping as it sends a strong signal that this type of behaviour is not acceptable. In the longer term, spending money on prosecution may save money from reducing the costs of dealing with dumped rubbish.

### **Between agency issues**

DOC has indicated a lack of resources to respond to abatement notices from TRC. In many cases the material is expensive to remove and use of enforcement is challenging.

In some other regions responsibility for managing illegally dumped waste is not always clear cut between regulatory authorities and landowners. A clear process is needed which outlines where each party's responsibility lies, e.g. monitoring, enforcement, cost of clean-up, recovery of costs, etc. This will also help identify the type and amount of resourcing required to deal with illegal dumping incidents and support a positive outcome: efficient clean-up of dumped materials and successful deterrence.

## 2. Data collection and analysis

The three district councils: New Plymouth District Council (NPDC), Stratford District Council (SDC), and South Taranaki District Council (STDC), the Taranaki Regional Council (TRC), the Department of Conservation (DOC) and the NZ Transport Agency (NZTA) were asked to provide all information on illegal dumping events that occurred during the twelve months from 1 January to 31 December 2013.

The agreed format was monthly reporting on: the number of events, the amount of waste being dumped (m<sup>3</sup>), the types of waste being dumped (number of events in each of these categories: Rubbish Bags; Greenwaste; Furniture, whiteware and electronic; Animal Carcasses; and Mixed Rubbish), and locations of events.

### 2.1 Overall comments, regional summary and comparisons by district

A more complete picture is now available as a result of the information collected for the 2013 calendar year. Each of the councils and NZTA have provided data on the number of events; and the councils have provided estimates of volumes.

It became apparent during the analysis for this report that a more standardized reporting process for illegal dumping both across agencies and in some cases within an agency would be helpful. For example, agreement on a minimum 'size' before an event is considered illegal dumping rather than littering. If a MacDonald's bag dropped out of a car window is counted by one agency but another is only recording larger events the aggregated data will not be especially reliable as baseline information. The way volumes, waste types and locations were recorded also varied between agencies. This is covered in more depth in the discussion section.

The total number of events recorded for Taranaki during 2013 for all agencies which provided this information was 249, or 21 per month. This is an increase from the 160 events recorded in the earlier (2011-2012) investigation; this data was only available from the four councils.

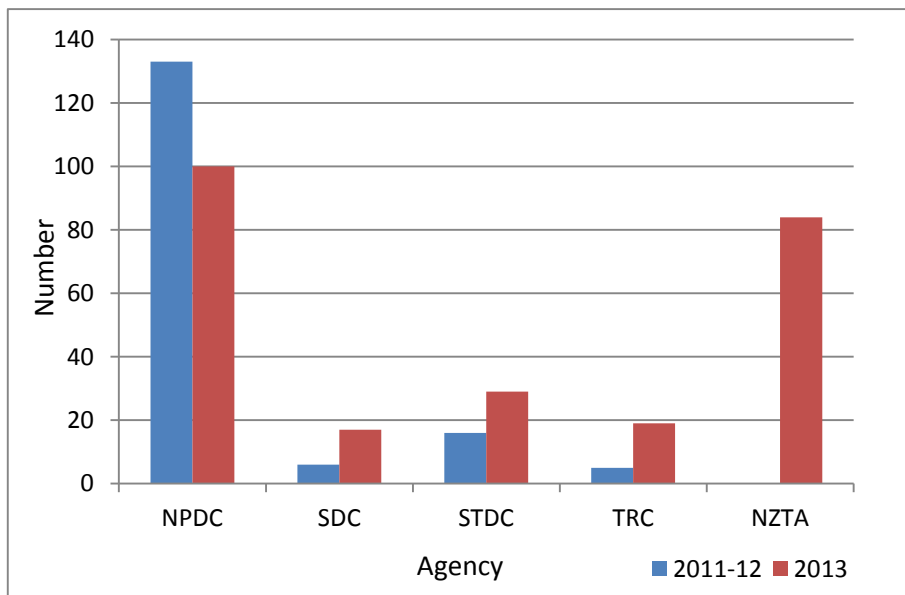
The total volume for all agencies which provided this information for 2013 was 967m<sup>3</sup>, or 81m<sup>3</sup> per month. Volumes were not available for the 2011-12 investigation.

**Error! Reference source not found.** below summarises the number and volume of illegal dumping events recorded by each agency during 2013, and during 2011-12 where this information was available. Figure 1 below is a graphical representation of the number of events by agency.

Very large volumes were recorded for five individual events, all of which were events reported to TRC, (three were in the NPDC area and two in the STDC area). Four of these were sites where dumping had been occurring over a long time period before being reported. Individually these were estimated at 450m<sup>3</sup> (a 'farm dump'), 100m<sup>3</sup>, 60m<sup>3</sup> and 40m<sup>3</sup>. The fifth, a one-off event, was estimated at 150 m<sup>3</sup>.

**Table 2** Number and volume of illegal dumping events in 2011-2012 and 2013 recorded by each agency

Agency	Number of events		Volume (m <sup>3</sup> )
	2011-12	2013	2013
NPDC	133	100	73
SDC	6	17	7
STDC	16	29	31
TRC	5	19	857
NZTA	nd	84	nd
DOC	nd	nd	nd
Totals	160	249	967

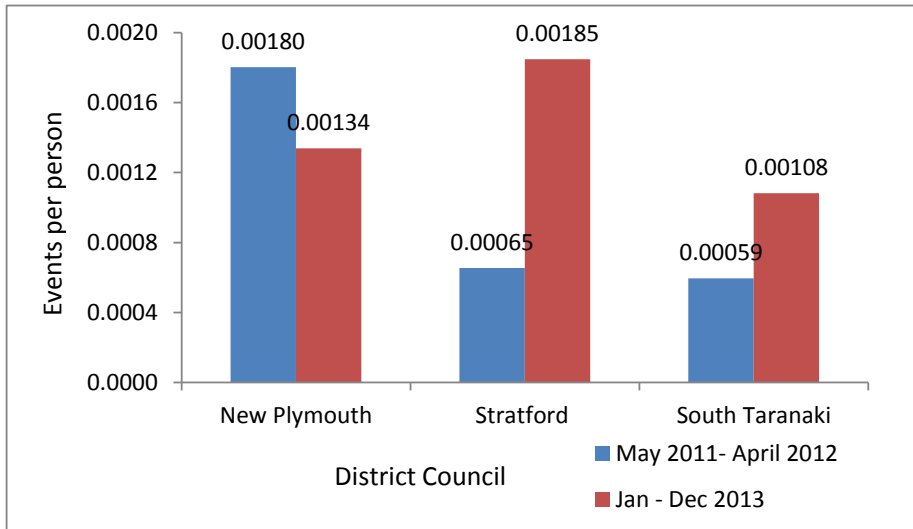


**Figure 1** Number of illegal dumping events in 2011-2012 and 2013 recorded by each agency

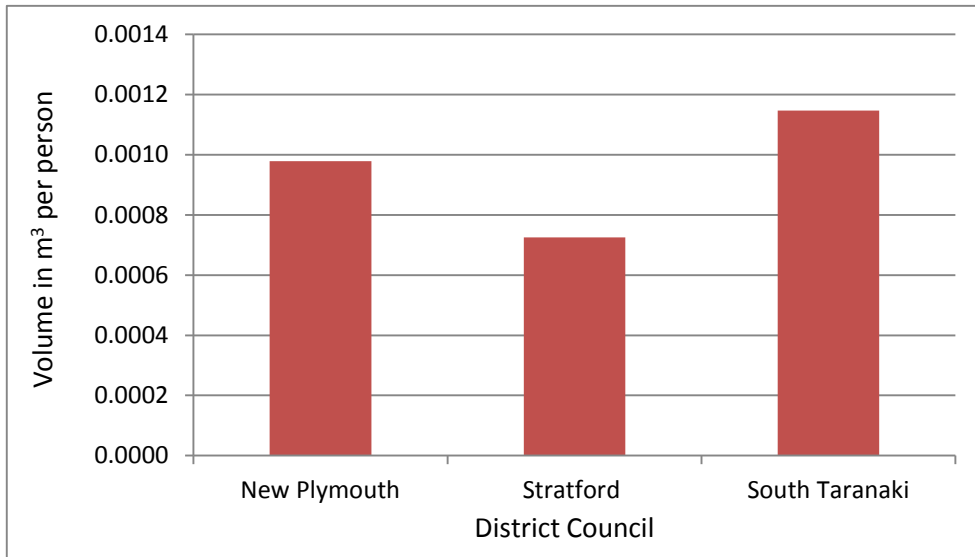
Figure 2 below shows the number of illegal dumping events reported to each council on a per person basis for the two sets of data available. Figure 3 shows the volumes per person reported to each district council for 2013.

For 2013, SDC had the highest number of illegal dumping incidents reported per person to the three district councils with NPDC the second highest. In the 2011-2012 period, NPDC was the highest per person.

The volume per person for 2013 was highest for South Taranaki.

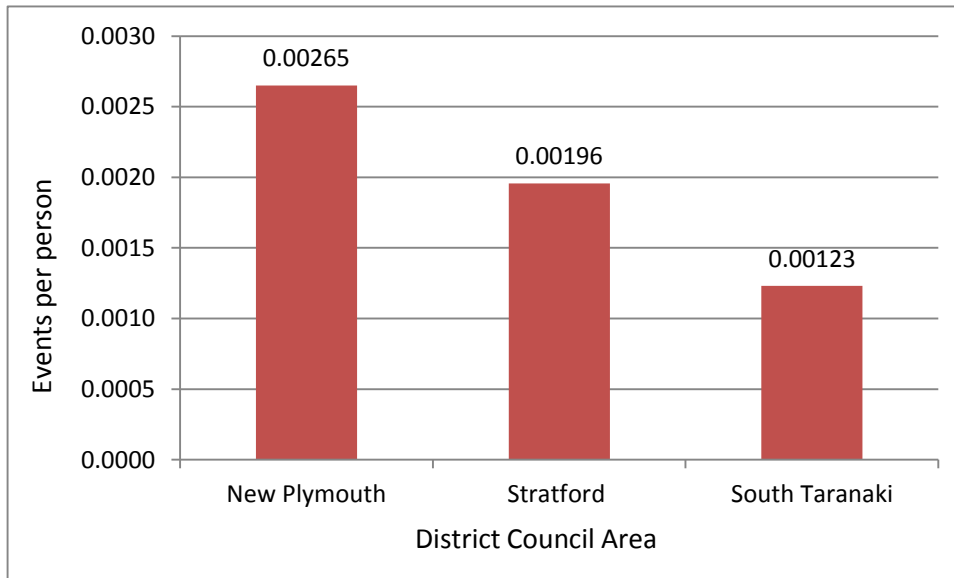


**Figure 2** Number of illegal dumping events recorded per person by each district council May 2011-April 2012 and Jan – Dec 2013



**Figure 3** Volume of illegal dumping events recorded per person by each district council Jan – Dec 2013

When the records for number of events from TRC and NZTA are also included, the highest number of events per person was recorded in the New Plymouth District area, considerably less for the Stratford area, and the lowest for South Taranaki area. This is shown in Figure 4 below. This information will be useful for future comparisons to identify whether the number of illegal dumping events and volumes recorded by each council and in each council district is changing over time.



**Figure 4** Number of illegal dumping events recorded per person in each District Council area including data from TRC and NZTA Jan – Dec 2013

Table 3 below shows number of events and volumes by district council area; both district council records alone, and combined district council, TRC and NZTA records.

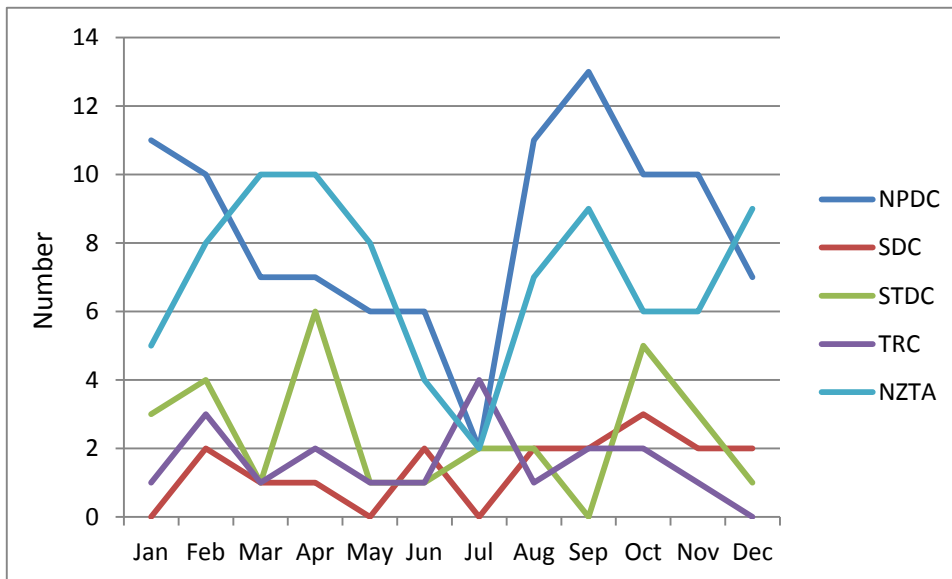
**Table 3** Number of events and volume by District Council area – district council data only; and district council, TRC and NZTA data combined

District	Number of events			Volume (m <sup>3</sup> )	
	2011-12	2013		2013	
	DCs only	DCs only	DCs, TRC & NZTA	DCs only	DCs & TRC
New Plymouth	133	100	198	73	329
Stratford	6	17	18	7	7
South Taranaki	16	29	33	31	631
<b>Totals</b>	<b>155</b>	<b>146</b>	<b>249</b>	<b>111</b>	<b>967</b>

While the data is more complete now than it was in the 2012 report, it is not yet possible to determine if there is a difference in the total number of events per district, or if more waste is being illegally dumped on to DOC land in the districts where illegal dumping reported to councils and NZTA is lower.

When volumes are recorded appropriately by each agency, a volume comparison may be made between districts.

**Figure 5** below shows number of events recorded monthly by each agency during 2013. There is no obvious pattern across the year. As more data is collected, the presence or absence of patterns may become evident.



**Figure 5** Number of events recorded monthly by each agency during 2013

## 2.2 New Plymouth District Council

Information on illegal dumping events is recorded by the Council's call centre when a complaint is received. For each event the type of waste is recorded as well as the location. For the 2013 calendar year the volume was also recorded by NPDC Parks, and at a later stage estimated by NPDC Environmental Health.

A total of 100 events occurred during the 2013 calendar year, an average of 8.3 per month; with a total volume of 73m<sup>3</sup> or an average of 6.1m<sup>3</sup> per month. The number of events was fewer than the 133 recorded in the 12 months of the 2011-2012 study.

As noted also in the 2012 report, illegal dumping outside the landfill gates and at transfer stations is cleaned up but not currently recorded and is therefore not included in these figures.

Illegal dumping occurs at remote locations and reserves. The biggest problems are at coastal sites, especially those where people can easily drive up and throw material out of the boot or off the trailer. Centennial Drive was noted as the most popular, followed by Kawaroa Park. It was also noted that rubbish bags are sporadically spread around existing rubbish bins. Bertrand Road Bridge was another site specifically mentioned.

It was not possible to analyse the types of waste by number of events due to a misinterpretation of the data collection requirements.



### 2.2.1 Actions taken

In all cases illegally dumped waste is removed by Council's contractors, who check the rubbish to see if those responsible can be identified. If this is the case, the incident is forwarded on to Environmental Health for further action.

Where illegal dumping of waste occurs in NPDC parks and the offender is not able to be identified, a letter drop is made to surrounding properties explaining that dumping of waste is illegal.

Environmental Health officers issued two infringement notices over this period, and contacted a number of other offenders.

### 2.3 Stratford District Council

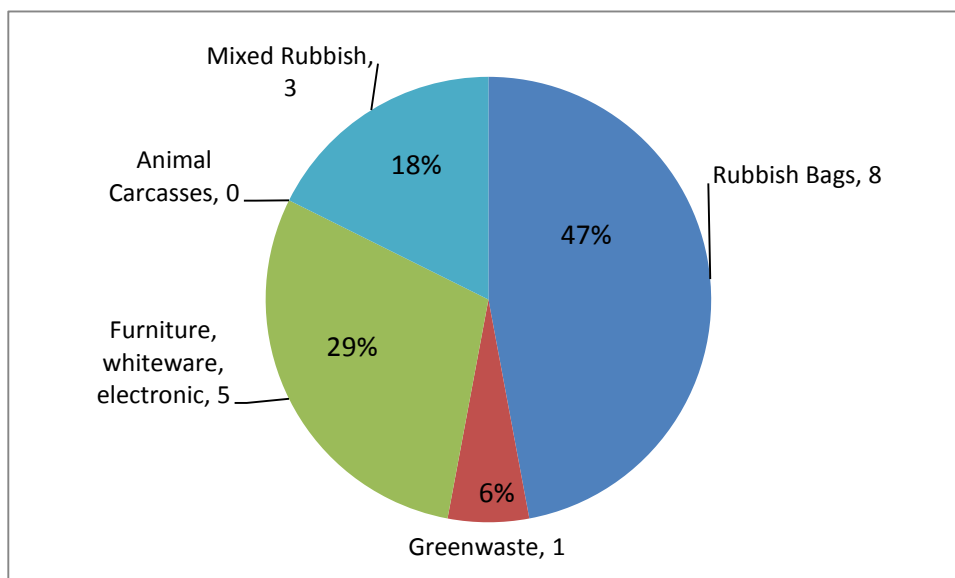
Information on illegal dumping is recorded by the Council's contractors when they respond to a complaint. The location and the type of waste are recorded, and for each month of the 2013 year a volume estimate was made.

A total of 17 events occurred during the 2013 calendar year, an average of 1.42 per month; with a total volume of 6.67m<sup>3</sup> or an average of 0.56 m<sup>3</sup> per month. The number of events was more than the six recorded in the 12 months of the 2011-2012 study.

Illegal dumping occurred at a mixture of urban and rural locations, some of which are remote: Orlando/Lear Streets, Cardiff Walkway (multiple events), Esk Road (multiple events), Midhurst Domain, Standish Road, Pembroke Road, Swansea/Warwick Roads, Celia Street (west), Brookes Road, Monmouth Road, Mangaoapa Road and Matau Saddle (multiple events).

In terms of the volume by types of waste, the largest volumes were from the categories 'mixed rubbish' and 'furniture, whiteware and electronic', including several mattresses.

Waste types by numbers of events are shown in Figure 6 below, with 'rubbish bags' being the largest category. In 2012, waste types were a mixture of large items such as TVs and a freezer as well as general household waste.



**Figure 6** Types of waste recorded as illegally dumped in 2013 by Stratford District Council

### **2.3.1 Actions taken**

Following a typical illegal dumping event the action taken is to record the incident and have Council's contractor undertake a cleanup. Should it appear that repeat offences are occurring, Council will attempt to identify the offender and where successful issue a notice of intent to fine or prosecute should further offending continue. During the period covered by this investigation Council did not consider it feasible to attempt to identify an offender. This process is the same as that described in the 2012 report.

## **2.4 South Taranaki District Council**

Illegal dumping incidents are recorded by the Council's Environmental Health Officer. Quantity and location is recorded along with the type of waste.

A total of 29 events occurred during the 2013 calendar year, an average of 2.4 per month; with a total volume of 30.75m<sup>3</sup> or an average of 2.6m<sup>3</sup> per month. The number of events was considerably greater than the 16 recorded in the 12 months of the 2011-2012 study.

Locations include Waiau River Opunake; Ngawhini Road (multiple events); the green waste dump, Patea; Whenuku Road, Normanby; Katene Road, Normanby; Scott Road, Hawera; Castle Street bridge, Eltham; Austin Road, Hawera; Matangarara Road, Hawera; Railway Road, Hawera; York Street, Eltham; Mountain Road, Normanby; Tawhiti Road, Hawera.

Illegal dumping also occurs outside transfer stations when they are closed with the biggest problem at Manaia. A record is being kept of this by date and type of rubbish. Dumping occurred outside the Manaia site on 45 days during 2013.

It was not possible to analyse the types of waste by number of events due to a misinterpretation of the data collection requirements.

### **2.4.1 Actions taken**

The process for dealing with illegal dumping reported to STDC is to photograph the waste and attempt to identify who is responsible. This information is then given to the Council's environmental health officer who decides if it is possible to issue an infringement notice. If so, these are then sent out. Five infringement notices were sent out during the period 1 January to 31 December 2013.

If the waste is not removed by the person who dumped it, Council contractors remove it and clean up the area.

At the time of the 2012 report, the process was different: if it was possible to identify who dumped the waste a letter was sent to the offender stating how they were identified. If there was no response within two weeks of the original letter being sent, an invoice was then sent out to cover the cost of the waste removal. Two letters were sent out in the period covered by the 2012 report.

More recently, during January 2014, a movable security camera was used at an area where illegal dumping regularly occurs, Manaia Transfer Station, to identify who was dumping the waste. The camera was in use for several days and resulted in six infringement notices being sent out; of which two paid the infringement cost. Some were disputed. The problem dumping at this site has reduced.

## 2.5 Taranaki Regional Council

A total of 19 events occurred during the 2013 calendar year, an average of 1.6 per month; with a total volume of 1898m<sup>3</sup> or an average of 158m<sup>3</sup> per month. The number of events was more than the five recorded in the 12 months of the 2011-2012 study. One further incident was passed on to the relevant district council.

Of these events, 14 were in NPDC's area, one was in SDC's area and four were in STDC's area.

The photos below show examples of various types of illegal dumping events investigated by Council staff.



**Photo 1** Illegal dump site on a farm (STDC area). Estimated volume 450m<sup>3</sup>



**Photo 2** Material dumped from private land on to DOC land (NPDC area): an example of an incident where dumping had occurred from the adjacent private house over several years and was only reported when the area was being cleared of weeds by a PD gang. Estimated volume 8m<sup>3</sup>



**Photo 3** Green waste Waimea Stream bank (NPDC area). Estimated volume 60m<sup>3</sup>

A reported dumping of TVs during October was included as an event, but the volume is unknown as the items were removed by the people who came across it prior to Council inspection.

In a category on its own is a dump site at Turuturu Mokai Reserve reported to the TRC in November 2013. This contains a large volume ('truckloads') of material and is still under investigation. It has not been included in the statistics as it is likely that it is decades since any material was dumped here.

One officer commented that he “had not seen a cleanfill that doesn’t turn into an illegal dump if it is not monitored and the gate kept locked.” It seems to be a regular practice that where gullies are being filled with acceptable material like soil and concrete, prohibited material like bitumen from road works, treated timber, green waste, whiteware and domestic rubbish are also dumped, unless strict controls are in place.

The two photos below show an example of illegal dumping in a farm gully. They were taken during the original inspection.



**Photo 4** Bitumen and bitumen coated brown paper from road works piled beside the gully

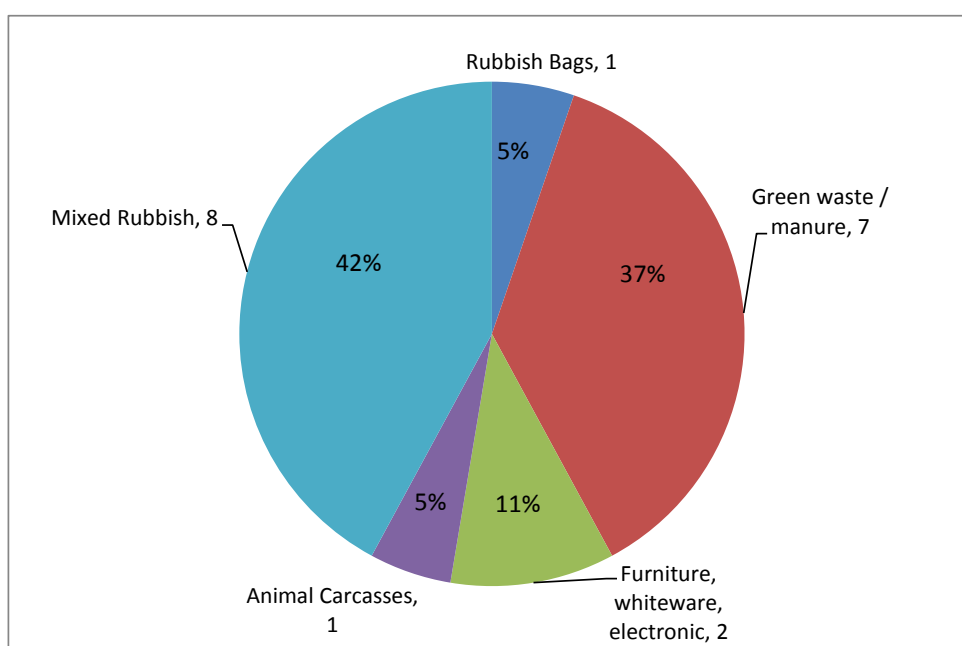


**Photo 5** Green waste, timber, corrugated iron and other rubbish at the same gully site as the photo above

Illegal dumping occurred at a mixture of urban (nine events) and rural locations (10 events).

In terms of the types of waste by far the majority of the volume was from the categories 'mixed rubbish' (278m<sup>3</sup>) and 'green waste' (577m<sup>3</sup>). The same applies to waste types by numbers of events, as shown in Figure 7 below, with 'mixed rubbish' and 'green waste' also being the largest categories.

In 2012, the five incidents recorded were all in the 'mixed rubbish' category; one of these was a dumped vehicle.



**Figure 7** Types of waste recorded as illegally dumped in 2013 by Taranaki Regional Council

### 2.5.1 Actions taken

Eight abatement notices and one infringement notice were issued relating to illegal dumping (in two cases two abatement notices were issued in relation to the same event). In another seven instances, the perpetrator was instructed to cease (and in one case to also apply for a consent), remove or bury in an approved manner. Where reinspections were necessary and had occurred by the time of writing this report, abatement notices and other instructions had been complied with.

## 2.6 Department of Conservation

Although the Department of Conservation does not keep records of individual illegal dumping events they were able to provide information on areas where evidence of illegal dumping is regularly seen. The situation remains unchanged since the 2012 report with tonnes of rubbish reported to be still lying out of sight in many DOC reserves. Much of this material has been there for years.

DOC finds that conservation areas in close proximity to small rural communities and on the edge of New Plymouth are the worst affected. They will address the problem of illegal dumping if it is an issue.

Sites in proximity to rural communities or on the edge of New Plymouth where illegal dumping continues to occur:

- Blue Rata Reserve in close proximity to Okato
- Ratapihipihi Reserve on the south western edge of New Plymouth
- Meeting of the Waters Reserve on the southern edge of New Plymouth
- Everett Park east of Inglewood
- Manukorihi Reserve on the south edge of Waitara
- Lucy's Gully
- Waiwhakaiho Carpark
- Old quarry up East Egmont
- Carrington Road, numerous spots

More remote sites where illegal dumping has occurred over many years and continues to occur:

- Tarata Reserve east of Inglewood and adjacent to Tarata
- Mt Messenger Reserve north of Uruti - numerous dump sites
- Waitaanga Reserve (the eastern fringe)
- Kirai Reserve at Strathmore
- Tarere forest off the end of the Ingahape Road
- Taramokou north of the Otoraua Road Tunnel
- Pukerangiora Pa Historic Reserve

Areas where it appears that rubbish and garden waste is being disposed of over the fence by adjacent landowners:

- Mangahinau Reserve on the south edge of Waitara
- William Corbett Reserve on the south edge of Okato
- Cantlop Reserve south edge of Bell Block

Most recently more rubbish has been dumped and reported on the North Egmont roadside, Blue Rata Reserve and Mt Messenger Reserve. Another car was abandoned on the North Egmont roadside.

In the 2012 report, Dave Rogers, the Programme Manager Visitor/Historic Assets at DOC, commented that a lot of the illegal dumping on their sites has been happening over generations and seems to have become accepted practice for some residents. This seems to be particularly the case in remote areas where a transfer station may be some distance away.

### **2.6.1 Actions taken**

During the 2013 year the Department has removed around three ute loads of rubbish from DOC reserves in Taranaki after reports from the public. During the May 2011 to April 2012 period, approximately 11 tonnes of waste and eight abandoned vehicles were removed.

DOC attempts to identify who has dumped the waste and will write to those involved and request that they remove it.

## **2.7 NZ Transport Agency**

NZTA did not specifically record illegal dumping on or around the state highways prior to the meeting in February 2013, and at that time thought it only occurred occasionally. Some earlier information is available by interrogating contract payments but this would only reveal the regularity of the problem not the volume of rubbish being dumped. Since then, they have discovered the extent of the problem, reporting later that month that SH43 rest areas had household rubbish being dumped at a rate of 10 to 12 bags per week, although this site is no longer such a problem.

It is also noted that while records are being kept of excessive dumping, there will still be some dumping of a smaller scale occurring that is not being recorded as such, mainly where household rubbish is being placed in rest area rubbish bins. Not all household rubbish is of a large size and hence some smaller scale items could easily be dumped into rubbish bins (e.g. small electronic devices such as old phones and keyboards). These are being inappropriately disposed of but would not constitute a large volume of total rubbish collected and would not be particularly noted when emptying a bin. NZTA records only pick up the larger volume dumping events not the smaller discrete ones.

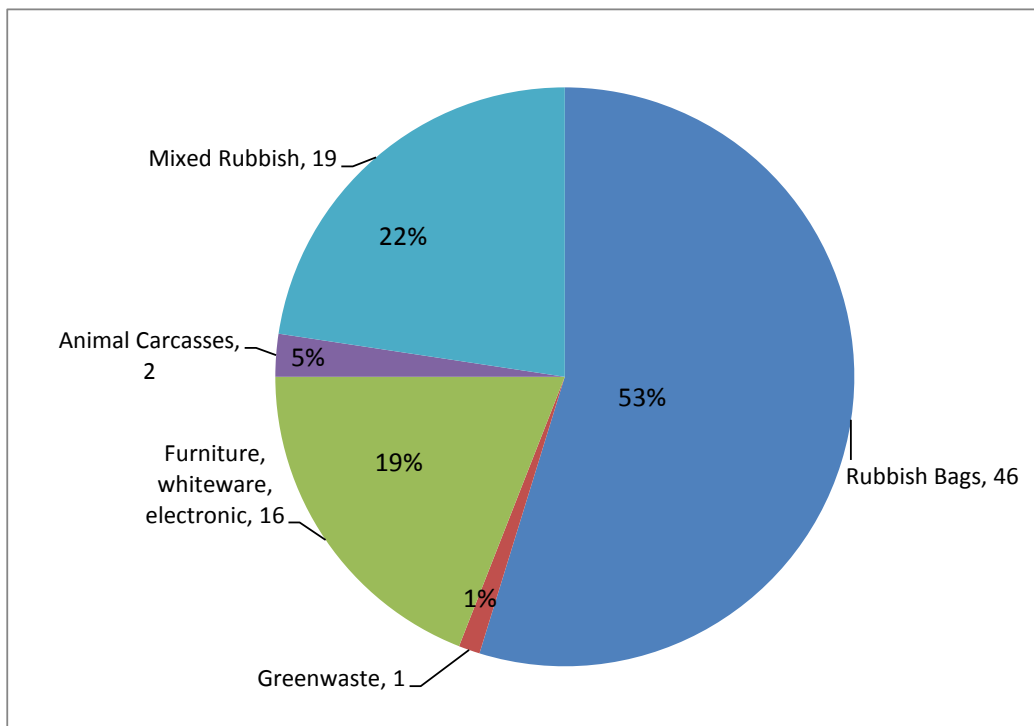
Information on illegal dumping is recorded by the Agency's contractors as part of the state highway maintenance contract. The locations and types of waste are recorded; volume is not.





**Photo 6** Examples of the types of rubbish dumped at State Highway rest areas

A total of 84 events occurred during the 2013 calendar year, an average of seven per month. All these events were in the NPDC area. Dumped material is frequently left adjacent to the rubbish bins supplied at State Highway rest areas.



**Figure 8** Types of waste recorded as illegally dumped in 2013 by NZTA

Waste types by numbers of events are shown in Figure 8 above, with 'rubbish bags' being the largest category.

Locations include the following (the number in brackets is the number of months during the year that an event was recorded for that site)

- Rapanui rest area (7)
- Mt Messenger (6)
- SH3/3A Junction (5)
- SH3A (4)
- Burgess Park (3)
- Airport Road rest area (2)
- Mohakatino (2)
- Tongaporutu
- New Plymouth West
- New Plymouth Junction Road
- SH 3 (near Okura Stream culvert)
- Bell Block
- Waitara
- Waiau Road area

Locations where illegal dumping was known to occur as at February 2012 included some of those above:

- Rapanui rest area, Mt Messenger rest area and Old Slip Rd Mt Messenger (around the side of the tunnel), SH3A rest area; Mohakatino rest area, and Tongaporutu rest area;

along with these additional locations:

- Ngaere rest area
- Norfolk Hall
- Normanby overbridge RHS heading south
- Parihaka Road rest area
- Weld Rd Intersection SH45

### **2.7.1 Actions taken**

Waste illegally dumped on NZ Transport Agency land is cleared by their contractors as part of the state highway maintenance contract. A review of illegal dumping was for a time included as part of their monthly meetings, but is now being recorded by their maintenance contractor and is requested/made available every six months.

Hidden surveillance was considered at a number of rest areas but none were found to be suitable.

### 3. Discussion

More information is now available on the extent of the problem in Taranaki, but gaps still remain, as indicated in the overall comments.

A meeting of all the agencies was held in May 2014 and agreement was reached that data collection was useful, and that all agencies would use a standardised reporting process for illegal dumping. This will be helpful for future comparisons after any actions are taken.

Areas of variability in data recording during 2013 included:

- The 'size' of an event before it was considered illegal dumping rather than littering
- Volumes: not all agencies record this as part of their normal procedures. Some started recording it as part of this exercise, but not all to the same level of accuracy, with some recording to the nearest cubic metre and others to the nearest 10L. Where volumes were not recorded, estimates have been made where possible by the relevant staff. Gathering this information has been time consuming
- Waste type: there was some misunderstanding over how this was to be recorded, for example some recorded number of rubbish bags in this category rather than number of events that involved rubbish bags, so this has not been analysed for all agencies
- Locations: further refinement could be useful for future comparisons. E.g. urban, rural; and for NZTA, TRC and DOC, which district council area the event occurred in.

Details of the agreements reached for standardised reporting are:

- Size of event to be included: one rubbish bag or one TV (smaller amounts to be considered litter)
- Volumes: if the waste type is rubbish bags, then record to the nearest 60L (a standard rubbish bag); otherwise estimate cubic metres based on W x L x H of the dumped material
- Locations: urban / rural, and for NZTA, TRC and DOC, which district council area the event occurred in. Comments on specific locations are useful
- Waste type: reminder to record number of events rather than number of rubbish bags etc.
- Waste type: add categories for tyres, car bodies and 'other'
- Modifying existing systems within each agency to record this information monthly and sending this to the TRC's Waste Minimisation Officer to collate
- Actions taken, like issuing abatement and infringement notices, to be collated annually rather than added to the monthly data collection spreadsheet.

In summary, standardised reporting across and within agencies will improve the accuracy of the data and streamline future comparisons.

Agreement was also reached on a collaborative regional campaign of education and enforcement aimed at reducing illegal dumping, supported by the six agencies. This will be launched in September to coincide with Keep New Zealand Beautiful week and with the Councils' Waste Minimisation Education Strategy's annual awareness campaign, which this year is focusing on illegal dumping.

## 4. Recommendations

It is recommended that:

1. The regional group, comprising the four councils, DOC and NZTA, continues to meet regularly to set in place the infrastructure, education and reporting framework needed for the regional campaign to reduce illegal dumping.
2. Information on illegal dumping continues to be collected for the duration of this regional campaign in order to indicate any effects of the campaign and any trends.
3. The duration and nature of the campaign is reviewed annually based on observed impacts.

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