

Memo

9 March 2018

To: Nick Walmsley, Water NZ
From: Daniel Yallop, Senior Waste Specialist, Auckland Council
Subject: **Draft Organic Material to Land Guidelines – Submission from Auckland Council**

Preamble:

- 1) This is an officer only submission from Auckland Council and may not reflect the entirety of Auckland Council, its supporting Council Control Organisations (CCO's), Council Own Organisations (COO's) or its elected members
- 2) Guidelines for beneficially reusing organic materials on productive land are under development. The guidelines will supersede **2003 Guidelines for the Safe Application of Biosolids to Land** and include additional organic material such as animal manures, and other agricultural wastes, which also contain pathogens and contaminants. Water New Zealand, WasteMINZ, the Centre for Integrated Biowaste Research (CIBR) and the New Zealand Land Treatment Collective (NZLTC) together with the ministries of Environment, Health and primary Industries are collaborating on their delivery
- 3) Nick Walmsley ran five (5) regional meetings to discuss a draft during February 2017, which over a hundred (100) people attended. Twenty-three (23) submissions from thirty-six (36) individuals and organisations were subsequently received. The project Steering Group held a meeting to consider these submissions on 27 April 2017 and formulated a programme to update the draft.
- 4) The updated draft documents are now available for further public comment. Submissions on this second draft will close at 5pm Friday, 9 March 2018. It is intended that the guidelines will be published by mid-2018
- 5) Auckland Council and Watercare Ltd prepared a joint submission on the first draft which covered ten key areas and presented a sizable submission to Water NZ. Given the progress made in these areas in the second and final draft, Auckland Council have limited feedback.

Discussion:

- 6) Auckland Council acknowledges the progress made in the second draft of the guidelines and in the main the ten discussion points raised in the first submission have been addressed.
- 7) For clarification the ten points are detailed:
 - a. The intent of the Guide

- b. National Environmental Standards (NESCS) – achieving balance between soil additive and potential contaminants
- c. National fertiliser standard and exception from the NES
- d. The use of nitrogen loading by as proxy for soil management
- e. Any requirements must consider the impact on cost of land application
- f. Stock exclusions
- g. NZS4454, composting and metal concentrations
- h. Thermal hydrolysis to be included as an approved technology
- i. Users of the Guide
- j. Structure of the Guide.

8) Use of digestate

- 9) Auckland Council believes that digestate should be specifically referenced as an organic material which can be directly applied to land. Digestate is a commonly produced end-product of wet anaerobic digestion (wet AD) plants that process food, biosolids and organic materials.
- 10) The plants can either singly or co-digest multiple organic products. Auckland Council wants to ensure that guidelines support future digestate application which may include a food/organic biosolids blends
- 11) Auckland Council is open to other organic materials being included in the guidelines including 'compost like products' from mechanical and biological waste treatment plants and 'floc' type' products from mechanical heat processing. This will ensure the guidelines are sustainable and effective in supporting future Auckland waste plans.

12) Zinc Levels

- 13) The proposed limit is 180ppm for urban soils. However, the 180ppm limit will become a barrier for some organic materials to be applied to land which goes against the intent of the guide
- 14) To ensure usability, particularly in urban environments Auckland Council recommends that an Eco-SQV limit for zinc should be 300ppm from products created from organic materials
- 15) The 300ppm comes from the soil limits in the 2003 Biosolids Guidelines which is considered more appropriate and reflects the current Asure Quality used for organic certification for compost.

Next steps:

- 16) The next steps which include publication of the guidelines by mid-2018 is welcomed by Auckland Council
- 17) Auckland Council is planning on rolling out its household food scraps collection service by 2021. This will involve around 50,000t of household food waste being processed every year. Positive and enabling guidelines will support this drive to divert organic material from landfill.

- 18)** Further Council wants to divert more commercial volumes out of landfill in its next waste plan due to be released in July 2018. Commercial volumes represent over 80 per cent of all waste produced in Auckland and it is fundamental this waste stream is addressed.
- 19)** Organic material is a significant percent of all commercial waste and enabling guidelines will underpin further landfill diversion, supporting Auckland Council on its journey towards zero waste by 2040.

Yours sincerely

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