



PROVINCIAL  
DEVELOPMENT  
UNIT

22 May 2018

Ref: OIA 1718-1071

Redacted - Privacy

Dear Redacted  
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Thank you for your email of 28 February 2018 to the Ministry of Business, Innovation and Employment (MBIE) under the Official Information Act 1982, for the following information:

"All information regarding the Renew Energy waste management project in Buller. Including, but not limited to:

- \* all correspondence with, and any information provided to, any Minister regarding the project
- \* all correspondence with the Ministry for the Environment regarding the project."

Please note that MBIE's public release regarding the Waste to Energy Project provides a factual review of MBIE's actions and communications regarding the Waste to Energy project. The review is available here: [Processes to be strengthened](#). The review identifies two emails between MBIE and the Ministry for the Environment, and these are attached. Parts of these emails are withheld under section 9(2)(a) of the OIA to protect the privacy of natural persons, including that of deceased natural persons.

Other documents provided to the Minister for Regional Economic Development have already been provided to you Redacted - Privacy

I have not identified a public interest sufficient to override my reasons for withholding parts of the released documents.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz) or freephone 0800 802 602.

If you wish to discuss any aspect of your request or this response, or if you require any further assistance, please contact me at [stephanie.weller@mbie.govt.nz](mailto:stephanie.weller@mbie.govt.nz).

Yours sincerely

Stephanie Weller  
Regional Economic Development Implementation Manager

PROACTIVELY RELEASED CONSISTENT WITH THE OIA

**From:** Hinemoa Awatere <Hinemoa.Awatere@mfe.govt.nz>  
**Sent:** Wednesday, 21 February 2018 2:48 p.m.  
**To:** John Doorbar  
**Cc:** James Walker, Shaun Lewis  
**Subject:** IN CONFIDENCE: Waste to Energy project

**Importance:** High

Tēnā koe John,

Ngā mihi o te wā ki a koe,

We are happy to provide more information. We consider this project may have serious implications for the investments in waste minimisation infrastructure in the South Island, will result in undermining other incentives to reduce waste, and will contribute to continued rise in carbon emissions.

**Project summary:**

In October 2016, and in previous years, this group has sought funding. As recently as November 2017, they seem to be discussing the same project which is to establish the first NZ fully operating domestic and commercial waste to energy processing plant.

*Their proposal: The resource of municipal and industrial waste can be diverted from current landfill disposal to a Waste to Energy processing plant for the generation of electricity. The establishment of such plant will provide a solution for waste to landfill, generate electricity, establish new industry and job creation for the West Coast.*

#### **Environmental (Waste) Concerns**

The current focus of the Waste Minimisation Fund (WMF), as well as policy currently in development, is to accelerate the transition to a circular economy. A number of investments have been made in the south island through the WMF (\$5,292,370 to date). As well as through the portion of the Waste Disposal Levy that is distributed directly to Territorial Authorities (approximately \$15 million per year), in developing infrastructure to reduce waste to landfill, by recycling and reusing material. A Waste to Energy plant would provide a disincentive to continuing use of this infrastructure, and result in equivalent harm to the environment as waste going to a landfill with gas collection. Waste to Energy plants in general, reduce recycling rates, as well as new investment in waste reduction infrastructure and products. The application to the WMF incorrectly asserts that New Zealand has a long term goal of zero waste to landfill. New Zealand does have a goal of moving towards 90% renewable energy by 2025, and this project may increasingly rely on burning waste coal.

#### **Economic Concerns**

The proposed Waste to Energy plant does provide economic benefits to the West Coast, but these would be largely achieved at the expense of other regions in the South Island. Significant investment in infrastructure would be rendered either obsolete, or require substantial changes to operations, logistics and equipment. The independent WMF panel, made up of industry members, believed that it was unrealistic to expect that the plant would receive sufficient feedstock to be sustainable, and that international examples of waste to energy plants are not cost effective without regulation – New Zealand does not currently have regulation conducive to waste to energy plants. The application to the WMF incorrectly asserts that New Zealand has a long term goal of zero waste to landfill. New Zealand does have a goal of moving towards 90% renewable energy by 2025, and this project may increasingly rely on burning waste coal.

**Specifically the Ministry provided this advice to the applicant:**

- The proposal offers regional benefits to the West Coast but potentially at the expense of other regions, which would need to make significant changes to current operations, logistics and infrastructure
- The project relies on the unrealistic expectation that it will receive all of the South Island's waste, except that from Canterbury
- The applicant does not demonstrate an understanding of the South Island waste market, for example the long-term nature of Council waste contracts
- The applicant has not secured adequate feedstock for the project
- Previous studies have identified that waste to energy is not cost effective internationally without regulation, including in a New Zealand context
- The applicant incorrectly asserts that New Zealand has a long term goal of zero waste to landfill. New Zealand does have a goal of moving towards 90% renewable energy by 2025, and this project may increasingly rely on burning waste coal
- The application demonstrates some key misunderstandings of the New Zealand legislative context, for example the erroneous assumption that landfills are required to close by 2040
- The business case and budget are not adequately formed
- Risks exist around changes to the wholesale electricity price with increased generation capacity

**Our general advice to members of the public who inquire regarding the use of waste to energy in New Zealand:**

Although waste to energy (incineration) is used in other parts of the world to generate electricity, it is a technology that comes with a range of negative environmental impacts, human health concerns, and high financial costs. Pyrolysis technologies are always improving, which is great; however, even the latest technologies still emit large quantities of greenhouse gases and release a range of harmful pollutants, such as toxic metals and dioxins, that can contaminate our land and water. Incineration plants also require a sustainable fuel source (waste), which New Zealand plans to reduce significantly through actions taken under the Waste Minimisation Act 2008.

**European Commission Brussels 26.1.2017 Report states**

To support the transition towards a more circular economy, public financing of waste management, whether national or at EU level, should be consistent with the goal of shifting upwards in the implementation of the EU waste hierarchy.

To support the transition towards a more circular economy, public financing of waste management, whether national or at EU level, should be consistent with the goal of shifting upwards in the implementation of the EU waste hierarchy.

At EU level, the transition towards more sustainable waste management systems receives financial support, mainly through the co-financing of the Cohesion Policy funds<sup>13</sup> In the case of these funds, pre-conditions must be met to ensure that new investments in the waste sector are in line with waste management plans designed by Member States to meet their preparation for reuse and recycling targets. As stated in the circular economy action plan, this means that investments in treatment facilities for residual waste, such as extra incineration capacity would only be granted in limited and well justified cases, where there is no risk of overcapacity and the objectives of the waste hierarchy are fully respected.

<http://ec.europa.eu/environment/waste/waste-to-energy.pdf>

Noho ora mai rā,

**Hinemoa Awatere**  
**Manager - Hono Tātaki, Resource Efficiency & Innovation**  
 Ministry for the Environment – Manatū Mō Te Taiao  
 Mob: 9(2)(a) Website: [www.mfe.govt.nz](http://www.mfe.govt.nz)  
 23 Kate Sheppard Place, PO Box 10362, Wellington 6143



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RELEASED UNDER THE  
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**From:** Hinemoa Awatere <Hinemoa.Awatere@mfe.govt.nz>  
**Sent:** Thursday, 22 February 2018 6:03 p.m.  
**To:** John Doorbar  
**Cc:** Shaun Lewis; James Walker  
**Subject:** RE: West Coast announcement summary

Kia ora John,

Ngā mihi o te wā ki a koe anō,

Thank you for keeping us informed as to developments, we really appreciate it.

It is great that we have started a conversation with you, and we look forward to exploring how we may work together more in the future in respect of regional development funding.

On this specific project, our view remains that, based upon available evidence of the risks of environmental harm (short and long term) we won't be able to support this project going forward. This waste to energy project directly contravenes our strategy for transitioning to a circular economy and reducing carbon emissions, and hence their failure to receive funding through the Waste Minimisation Fund.

We welcome the opportunity to provide comment on the environmental implications of the project at the appropriate time.

My director Shaun Lewis and I would like to meet with you soon to discuss how we may work together on this project and others. We are happy to host you here, or we can come to you.

Noho ora mai rā,

Hinemoa Awatere  
Manager, Hono Tataki – Resource Efficiency & Innovation  
9(2)(a)  
Ministry for the Environment – Mahatū Mātaia

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**From:** John Doorbar [mailto:John.Doorbar@mbie.govt.nz]  
**Sent:** Thursday, 22 February 2018 11:42 a.m.  
**To:** Hinemoa Awatere  
**Subject:** West Coast announcement summary

Kia ora Hinemoa

Attached is the Press Release for West Coast projects including the Waste to Energy plant.

We've reigned it right back to early stage assessment including the environmental implications.

I hope that this sits better with you and the team.

Please let me know urgently if there are issues with this as the Minister Jone's office wants the suite of PRs confirmed by 12.00 noon.

Nga mihi  
John

**John Doorbar**

DIRECTOR, | KAIWHAKAHAERE

Regional Economic Development – Science, Skills and Innovation Group | Te Wahanga-ā-Rohe, ā-Taone – Te Pūnaha Hiringa Whakaea

Ministry of Business, Innovation & Employment | Te Manatū Pakihi, Auahatanga me Ngā Kaupapa ā-Mahi



**MINISTRY OF BUSINESS,  
INNOVATION & EMPLOYMENT**  
HIKINA WHAKATUTUKI



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