

Submission: The Draft Auckland Trade Waste Bylaw 2013

North Harbour Business Association

Janine Brinsdon – General Manager

P O Box 303 126

North Harbour 0751

Phone 09 968 2222 or 021 212 4942

Email: janine.brinsdon@nhba.org.nz

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Please note: We do wish to speak to this submission.

Introduction:

North Harbour Business Association is an industrial BID area, representing over 2500 commercial property owners and businesses within the North Harbour area.

Our business comprise of a mix of Small Medium Enterprises (SME), multinational organisations representing sectors such as ICT, business services, specialist manufacturing and light – medium warehousing. In addition to the businesses, we have key educational institutions such as Unitec, Pinehurst, Kristin and Albany Primary schools – plus additional vocational institutions, all within an industrial estate which is on average less than 20 years old. We also have leisure facilities with North Shore Golf Club and North Harbour Softball and Hockey fields within our BID area.

Our primary interests are those decisions within the Draft Auckland Trade Waste Bylaw 2013 which:

- impact on the cost of business – across a short to medium timeframe
- impact on economic development and the ability to leverage value from location
- impact on the ability to leverage natural assets for economic development across leisure and tourism sectors – enhancing Auckland’s reputation as the world’s most livable city.

Feedback to proposed structure and processes:

NHBA and their members are in support of the rationalization of the four existing tariffs into a sole tariff platform. We believe this will encourage increased transparency across supplier relationships and remove unfair competitive advantages which were awarded simply through location.

We are in support of removing the 44 separate charging schemes, and the historic anomalies inherent in a fragmented pricing policy.

We are in support of establishing regional limits on contaminants – the volume and composition of trade waste and the positive impact on the environment and public health as a result. We understand Watercare’s need to mitigate the risk of contamination and the impact across a regional infrastructure.

To simplify business process, we are in full support of Watercare's three tiered categorisation: Deemed, Conditional and Prohibited. We again support the removal of the need to report annually for those trade customers whose waste is classified as deemed. We accept that this classification structure could provide an incentive for improved business processes and systems and this should be rewarded.

The proposed option to transfer agreements should the business be sold is appreciated. Some questions raised as to the length of tenure for this transferred agreements, if there was a review attached, and how Watercare would ensure consistency of operational practices and processes with the new owner.

Conclusion:

26.3.2013

Further to recent correspondence with Myles Lind – Watercare Services Limited, this submission serves to advise that we will complete our formal submission by 28 March 2013 following further consultation with our members.

We wish to provide them with the opportunity to review their personal requirements and to gain an understanding of these changes to their business directly and through their suppliers.

2.4.2013

Unfortunately even with the extension, we have not been able to contact as many of our members as we would like, the end of the financial year and public holidays have proven challenging in terms of access to decision makers. Therefore this is a representative submission as opposed to detailed.

In general, we are in support of Watercare managing trade waste customers by bylaw through Trade Waste Agreements if this delivers a more responsive, tailored and less bureaucratic compliance programme for business. We are in support of a fixed/volumetric charging mechanism – similar to the non-domestic waste water tariff proposal as that rewards effective management and rewards improved conservation processes.

In general, the transitional consent process from North Shore bylaws to an Auckland regional by is acceptable, to protect the budget and business planning processes of our businesses. However we note that those customers within the Auckland Regional Council ByLaw 1991 who do not have containment limits/concentrations, and as such may be looking at large increases, could impact on North Shore through existing supplier relationships.

It is the latter which appears to be of most concern to NHBA BID members, with one company in particular facing increases from their supplier which would make the electroplating of their core components unsustainable. This could have a potential impact on over 100 employees.

We therefore seek commitment from Watercare that they will proactively manage the transition to the proposed single tariff, and be open to variances which are caused by supplier chain relationships rather than simply access the impact on the direct end user. We appreciate Watercare's offer to work with the suppliers to educate them about water conservation and efficiency programmes, however if a business is contractually obliged to use a supplier and is not in a position to change within the foreseeable future, then a financial support structure needs to be offered which helps mitigate risk. For example – Assa Abloy are facing substantial increases from their two preferred (existing) suppliers – both not located on the North Shore.

On behalf of our members, NHBA wishes to acknowledge Watercare's commitment to public consultation with business and for your tolerance of our delayed submission.