



# **Submission on Proposed National Environmental Standard for the Outdoor Storage of Tyres**

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For more information please contact:  
Jane Murray  
NMDHB Public Health Service  
Email: [jane.murray@nmdhb.govt.nz](mailto:jane.murray@nmdhb.govt.nz)  
Phone: (03) 543 7805

## **Introduction**

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Ministry for the Environment *Consultation Document on a Proposed National Environmental Standard for the Outdoor Storage of Tyres* (Proposed NES).
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000, the Health Act 1956, and the Biosecurity Act 1993.
3. This submission sets out particular matters of interest and concern to NMH around environmental and public health matters.

## **General support**

4. NMH strongly supports action by central Government to reduce the risk of environmental harm from the stockpiling of waste tyres and to support waste tyres being channelled into more sustainable recycling and disposal options.
5. NMH believes that the proposed NES will assist with these goals by providing a framework to regulate, monitor and recover costs associated with outdoor tyre stockpiles; and hopes that it will also incentivise the use of more sustainable options.
6. However, NMH would like to emphasise the importance of ensuring that initiatives involving sustainable alternatives take into account smaller provinces. For example, by providing adequate transportation linkages to the larger centres where the sustainable options will be based.

## *Recommendation*

7. That initiatives which support more sustainable recycling and disposal options take into account and provide for smaller provinces.

## **Council responsibility**

8. (Question 1) NMH supports the decision to make regional councils, rather than territorial authorities, be responsible for the NES, as this, as noted in the consultation document, will ensure the risks associated with existing stockpiles can be addressed.

## **Threshold options**

9. The Consultation Document discusses the environmental effects that the Proposed NES seeks to manage including fire risk, the discharge of contaminants into soil or water, the creation of breeding grounds for mosquito or rodent populations that may spread disease, and impacts on visual aesthetics.
10. (Question 2) NMH is pleased to see that the Ministry is now considering reducing the threshold for requiring discretionary resource consent for tyre storage from 200m<sup>3</sup> to

100m<sup>3</sup>. In 2017, NMH voiced concerns that the larger threshold only appeared to take into account fire risk and not the other recognised potential environmental or public health effects. NMH questioned whether the 200m<sup>3</sup> threshold would adequately manage mosquito populations or the discharge of contaminants and associated effects on groundwater drinking supplies and biodiversity. NMH supports the revised 100m<sup>3</sup> threshold as it would provide a stronger framework for mitigating key environmental and public health risks.

11. (Question 3) NMH supports the introduction of a permitted activity rule with requirements. Introducing a permitted activity rule with requirements for outdoor tyre storage between 40m<sup>3</sup> and 100m<sup>3</sup> will enable the council having discretion to be more stringent to address adverse effects. NMH supports the indicative requirements in relation to the height of tyre piles and that tyres must not be located within 50m of coastal marine areas or 20m of any water body.

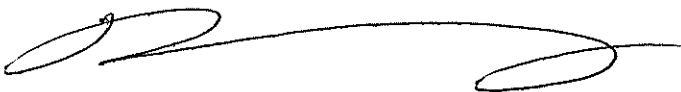
*Recommendation:*

12. *Permitted activity rule requirement (Question 4):* Tyres must not be located near ports / airports as there is a greater risk of foreign mosquito species entering the country and spreading disease in these locations.
13. *Permitted activity rule requirement (Question 4):* Tyres must not be located within a source protection zone for a drinking water supply source as identified by councils. This clause is to ensure there is no contamination from potential overland flow of pollutants into surface water and groundwater.
14. (Question 8) NMH also acknowledges that tyres used for legitimate purposes (e.g. silage cover) need to be excluded given that these are generally stored in smaller volumes and in a controlled manner, and therefore do not present as great a risk.

**Conclusion**

15. NMH thanks the Ministry for the Environment for the opportunity to comment on the Proposed NES.

Yours sincerely



Peter Bramley  
**Chief Executive**  
peter.bramley@nmdhb.govt.nz