



## Letter to the Editor of Hawke's Bay Today Newspaper

HB Today has kept a good eye on the Pandora tyre dump for some time.

Most recently Roger Moroney reported that export of these tyres was an option, subject to a market being secured.

Most of the tyres that have been exported from Napier by the defunct operator and from other NZ ports were sent to China to be used as fuel in steel mills, concrete kilns and similar voracious energy consuming operations. Tyres were in demand as an alternative to coal because last year coal had become unsustainably expensive.

No doubt that some of the tyres were also used inappropriately as an alternative fuel in unsatisfactory circumstances - for the same reason.

Surprisingly the export of waste tyres, tyre wastes and fractions of waste tyres for supply into China was banned by the Chinese government on March 1st 2008.

Announcement 11, 2008 by the Chinese Government refers to a) "Law of the People Republic of China on Prevention and Control of Environmental Pollution Caused by Solid Waste" and b) "Basel Convention on the control of Transboundary Movements of Hazardous Wastes and their Disposal.

Announcement 11 is authorised by the Chinese; State Environmental Protection Administration, Ministry of Commerce, National Development & Reform Commission, General Administration of China Customs & General Administration of Quality Supervision, Inspection and Quarantine.

The first section of the announcement refers to "Forbidden Import Solid Waste in China".

In the catalogue of solid waste forbidden into China are tyres. Specifically;

#42 - 4004000010 - wasted tyre and its dices [shredded tyres]

#43 - 4004000020 - waste parings and scrap of vulcanised rubber (other than hard rubber)

#44 - 4004001010 - waste hard rubber in various shapes

It seems clear that China is not going to be a future destination for any waste tyres from Napier, from New Zealand or any other place, that is apart from Chinas own huge production of them.

New Zealand is a signatory of the Basel Convention.

Because accountability chains are established from the source, even though title passes upon entering into a contract, the prospect of the ratepayers of Napier or the taxpayers of NZ being comfortable with any beuraucrat signing up to a recovery operation for Mt Pandora that is based on export to China is not a rosy or likely one.

Lets hope that our good representatives understand the implications of cocking it up and approving export! Just refer to 'Clean Green NZ' promotions being shown on CNN in their story on NZ breaking Chinese environmental law. It could be our San Lu 2009!

However its not all doom that we are going to have to find a local solution. In fact one of the questions put to the recycling industry was " how could recycling help defeat the recession?". What great timing! By sorting out the tyre disposal issue locally, nationally, by using the solutions we have had for years and chosen to ignore.

NZ has two cement kilns, five lime kilns and two steel mills; these are good safe places to co-combust tyres in. NZ also has a tyre recovery infrastructure almost nationally established. We are also blessed with a few hardy entrepreneurs that have spent years developing alternatives to dumping tyres.

With the Waste Minimisation Act about to be implemented the tyre supply industry are going to be expected to get organised to deal appropriately with our tyre discards. Mt Pandora is just the tip of an iceberg and in a way its been a good thing, because we now appreciate the hazard of that stupidly created eyesore and we will more willingly support the tyre industry as they work to deliver the right solution, the one we expect and are prepared to pay for.

Yes, pay for. People use tyres to meet simple needs. They are are must have, no options. Because we are the users therefore we are the discarders, the wasters. Don't even think its the tyre industries fault - they only make them because we keep buying them. Back to Mt Pandora; we should be disappointed the process is taking so long. The responsible authority should, right now, engage contractors to separate the vast pile into discreet piles so spaced as to prevent spread of fire, to provide the Fire Service immediate access should a fire start.

Sure the smoke would be horrible and we would need to evacuate but the worse problem is that when masses of tyres burn they melt. The 'oil' produced will flow, burning, into stormwater drains. If we manage to extinguish that the resultant 1 million plus litres of semi-liquid goop will foul the Ahuriri estuary and lagoon. It could be a significant long term problem for Hawkes Bay.

Very hard to understand why this all took 12 months and still is not safe.

It is too risky to delay.

Make it safe before worrying about how to get rid of the tyres.

Bruce Gledhill  
Executive Director Recyclers of NZ Inc

Reference: <http://www.ronz.org.nz/RONZPage.aspx?PageId=93>