

ICOMOS NEW ZEALAND
TE MANA O NGA POUWHENUA O TE AO
INTERNATIONAL COUNCIL ON MONUMENTS AND SITES
CONSEIL INTERNATIONAL DES MONUMENTS ET DES SITES
CONSEJO INTERNACIONAL DE MONUMENTOS Y SITIOS

Submission to the Ministry for the Environment on:

Reducing waste: A more effective landfill levy

3 February 2020

Introduction

ICOMOS is an international non-governmental organisation of heritage professionals dedicated to the conservation of the world's historic monuments and sites. The organisation was founded in 1965 as a result of the international adoption of the Charter for the Conservation and Restoration of Monuments and Sites in Venice in the previous year. ICOMOS is UNESCO's principal advisor in matters concerning the conservation and protection of historic monuments and sites. The New Zealand National Committee was established in 1989 and incorporated in 1990.

ICOMOS New Zealand has 107 members made up of professionals with a particular interest and expertise in heritage issues, including architects, engineers, heritage advisers, archaeologists, lawyers, and planners.

In 1993, ICOMOS New Zealand published the ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Value. A revised ICOMOS New Zealand Charter was published in September 2010 and is available on the ICOMOS New Zealand website. The heritage conservation principles outlined in the ICOMOS New Zealand Charter are based on a fundamental respect for significant heritage fabric and the intangible values of heritage places.

Our submissions

In recent years, New Zealand has seen large-scale demolition as a result of the Canterbury Earthquakes of 2010 and 2011. This resulted in the almost complete destruction of the central business district of Christchurch, one of our main centres and home to a much-loved collection of hundreds of heritage buildings. The unnecessary destruction of irreplaceable heritage items impacts on people's wellbeing and also causes environmental impacts by producing huge volumes of demolition waste.

ICOMOS New Zealand supports the intent of the Government's proposals for landfill levies, but submits that they should be strengthened. We also support the improved data collection, compliance monitoring and enforcement proposed.

Construction and renovation can have adverse climate change effects

We read with interest the New Zealand Green Building Council's 2019 report 'Under Construction: Hidden emissions and untapped potential of buildings for New Zealand's 2050 zero carbon goal', which found that constructing and renovating New Zealand buildings between now and 2050 could pump out climate change pollution equivalent to one million cars on the road every year. We agree with the NZGBC that it is absolutely essential for the government to take the lead on decarbonising our buildings.

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Heritage conservation can contribute to emissions reduction and mitigate the effects of climate change in other ways

Landfill levies that target construction and demolition waste incentivise retention and refurbishment of existing buildings. Recycling buildings not only contributes to New Zealand achieving its emissions reduction targets, but where buildings with heritage value are retained there are additional wellbeing benefits. We note the benefits of the proposal that you have outlined, and would add the additional wellbeing benefits that can be derived from the conservation of older or heritage buildings, such as sustainable development, community and national identity and community resilience.

Despite the well-founded community benefits of heritage retention, often when decisions are made about the future of heritage buildings, it is the economic impacts on the owner that are a major factor. The cost of a new build and demolition versus retention and repair will often favour demolition, due to the resources required for the restoration of heritage buildings.

If landfill levies were increased for demolition waste this would assist in achieving a better balancing of options for heritage building owners, and would support the retention of heritage buildings for the wealth of community benefits it provides

International studies on the economics of heritage restoration and the adaptive reuse of buildings show that it creates more jobs and contributes more to the economy than new construction. Heritage restoration is characterised by labour intensity as opposed to material intensity for new construction – numerous studies showing it creates more jobs both direct and indirect than new construction.

ICOMOS international has published research showing how cultural heritage offers immense and virtually untapped potential to drive climate action and support ethical and equitable transitions by communities towards low carbon, climate-resilient development pathways.

Retaining and reusing existing built stock reduces our carbon footprint and extends the economic life of buildings. For example, Donovan Rypkema, an international expert on the economics of heritage, points out that demolishing a typical North American commercial building - 7.5 meters wide and 36 meters feet deep - wipes out the entire environmental benefit from the last 1,344,000 aluminum cans that were recycled. And that calculation only considers the impact on landfill.

Razing historic buildings results in a triple hit on scarce resources:

1. loss of thousands of dollars of embodied energy;
2. replacing it with materials which generally consume vastly more energy; and
3. loss of the recurring embodied energy savings which increase dramatically as a building life stretches over fifty years.

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Conclusion

For the above reasons it is ICOMOS New Zealand's submission that the landfill levy rate should be the same for municipal waste and demolition waste, as each tonne of waste has the same impact on the environment. While the municipal landfill rate is proposed to be increased to \$50 or \$60, construction and demolition is only proposed to be raised to \$20 by 2023. The proposal will impact everyday New Zealanders most, when in actual fact, construction and demolition waste makes up 50% of most landfill waste.

ICOMOS New Zealand
secretariat@icomos.org.nz