



Environment Protection Authority

GPO Box 2607 Adelaide SA 5001

211 Victoria Square Adelaide SA 5000

T (08) 8204 2004

Country areas 1800 623 445

EPA

Mr David Jones
General Manager, Adjudication
Merger and Authorisation Review Division
Australian Competition and Consumer Commission

Via email: adjudication@accc.gov.au

Dear Mr Jones

Re: AA1000419 Council Solutions processing service streams submission

Thank you for the opportunity to comment on the application by Council Solutions, with their four partner metropolitan Adelaide councils, to collaboratively procure waste processing services for recyclables, organics and residual wastes.

The Environment Protection Authority (EPA) is South Australia's independent environment protection regulator whose role is to protect, restore and enhance the environment through the risk-based regulation of pollution, waste, noise and radiation. We work closely with industry, the community and government to protect our unique natural environment while supporting economic growth and improving wellbeing.

The Council Solutions' application offers significant environmental benefits that align with South Australia's Strategic Plan target of a 35% reduction of waste to landfill by 2020. It also aligns with South Australia's Waste Strategy 2015-2020 vision of a resource efficient economy with a culture enabling the community, businesses and institutions to strengthen zero waste strategies, and the strategy's target of diverting 70% of municipal solid waste away from landfill by 2020. In particular the application has the potential to result in improved resource recovery by:

- reduced waste production and less contamination of recyclable, organic and residual waste streams, by better informed ratepayers due to combined education materials and better targeted and managed communication strategies,
- better management of collected waste streams driven by secure contracts of larger volumes that should support greater investment in processing of recyclables, organics and residuals, and
- supporting innovation within the resource recovery sector through economies of scale.

The application aligns with objects (s10) of the Environment Protection Act 1993 which include encouraging and assisting public authorities and the community to reduce adverse effects on the environment by:

- supporting cleaner production, resource recovery and application of the waste management hierarchy, and



Environment Protection Authority

GPO Box 2607 Adelaide SA 5001
211 Victoria Square Adelaide SA 5000
T (08) 8204 2004
Country areas 1800 623 445

- promoting the circulation of materials through the waste management process to support a strong market for recovered resources.

The application also supports the waste management objective of the Environment Protection (Waste to Resources) Policy 2010 to achieve sustainable, best practice and accountable waste management by:

- having effective recording, monitoring and reporting systems for waste transport, resource recovery and waste disposal, and
- within the community promoting environmental responsibility and involvement in waste avoidance, waste minimisation and waste management.

The SA EPA does not object to the application by Council Solutions because it has the potential to improve waste management in line with South Australia's Waste Strategy, South Australia's Strategic Plan and the objectives of relevant legislation.

Note the EPA consents to this submission being placed on the ACCC public register. For further information on this matter, please contact Sam Wade, sam.wade@sa.gov.au or (08) 8463 3747.

Yours sincerely

A handwritten signature in blue ink that reads 'Circelli'.

Tony Circelli

CHIEF EXECUTIVE

ENVIRONMENT PROTECTION AUTHORITY

Date: 22/6/2018