



CITY OF  
ADELAIDE

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Reference: 2015/02855

Tuesday, 5 June 2018

Australian Competition & Consumer Commission  
Attn: Tessa Cramond  
Level 17, Casselden  
2 Lonsdale Street  
Melbourne Vic 3000

sent via e-mail: [adjudication@accc.gov.au](mailto:adjudication@accc.gov.au)

cc: Oliver Barry [oliver.barry@councilsolutions.sa.gov.au](mailto:oliver.barry@councilsolutions.sa.gov.au)

Dear Ms Cramond

**Submission in relation to application for authorisation AA1000420**

We refer to the above matter, in which the Australian Competition & Consumer Commission (**ACCC**) as requested a submission from the Corporation of the City of Adelaide (**the City of Adelaide**) as an interested party.

The City of Adelaide submits that the ACCC should grant the authorisation sought by Council Solutions for the reasons set out in the application from Council Solutions and below:

1. The City of Adelaide has directed Council Solutions to act on its behalf and facilitate the procurement, negotiation and contracting process in relation to ancillary services.
2. By conducting a separate request for tender process for the ancillary services stream it:
  - a. maximises competition by allowing potential suppliers who are capable of providing any or all of the ancillary services to tender without also being required to provide 3-bin system collection services. This opens up the opportunity to potential suppliers, large and small, generalist and specialist, to tender; and
  - b. provides a greater focus on the delivery of these services where diversion is typically low and difficult to manage.
3. The procurement will assist the City of Adelaide in achieving its strategic objective of *'...implement[ing] a waste, recycling and reuse approach for the City that reflects world's best practice and the use of smart technology'*. The City of Adelaide has and will continue to roll out smart bins in public areas across the City.
4. The City of Adelaide is committed to its partnering with other local government areas, in particular through its association with Council Solutions. This is demonstrated by the City of Adelaide's 20-year association with Council Solutions (previously known as G6).



Please feel free to contact Danielle Arnfield on the above details with any further enquires. The City of Adelaide looks forward to a positive outcome for the application.

Yours sincerely



**Mark Goldstone**  
CEO – City of Adelaide

