



**Environment Protection Authority**

GPO Box 2607 Adelaide SA 5001  
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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](mailto:adjudication@accc.gov.au)

Dear Mr Jones

**Re: AA1000420 Council Solutions ancillary 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 ancillary waste services for the collection, processing and disposal of recyclables, organics and residual wastes from multi-unit bulk bins, kerbside hard waste and council park and footpath public bins.

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 and an improved focus on the processing of recyclables, organics and residuals from these waste sources due to ancillary services being contracted separately, rather than as an add-on to kerbside waste contracts,
- supporting innovation within the resource recovery sector through economies of scale, including the potential trial and deployment of smart technology in public bins, and
- better performing residential hard waste collection to help combat illegal dumping.



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The proposal also has the potential to reduce transport related air and noise pollution from more efficient collection services.

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
- 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](mailto: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