

17 November 2023

Ben Janover
Analyst
Competition Exemptions | Mergers, Exemptions & Digital
Australian Competition & Consumer Commission
GPO Box 3131
Canberra ACT 2601

Our Ref: 2023/756421

Dear Mr Janover

SSROC Application for authorisation AA1000651 – Invitation to Comment

Northern Beaches Council welcomes the opportunity to provide feedback on the Application for Authorisation from Southern Sydney Regional Organisation of Councils (SSROC).

As a large Sydney metropolitan council, this SSROC proposal is of significance in terms of the likely impact on costs for councils, recycling rates and markets.

In this respect, Northern Beaches Council supports the rationale for the proposed conduct to improve the way the comingled kerbside recycling stream is processed, and potentially promoting new processing capacity through planned or newly built materials recycling facilities (MRFs) for the Sydney market.

Northern Beaches Council does, however, wish to express caution that this proposal not lead to an increase in market power for any existing provider of MRFs. Currently, there are very few MRF operators servicing Sydney. It will be important, in relation to CRESS 1 and CRESS 2, that any procurement process does not enable the existing MRF operators to misuse any increase in market power to the detriment of councils within, and outside of, the CRESS project (e.g., by raising prices).

We would be happy to discuss this submission further with you.

Should you require any further information or assistance in this matter, please contact my office on [REDACTED]

Yours faithfully



Todd Dickinson
Director Environment and Sustainability