



Environment Protection Authority
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EPA CE-18-0096

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: AA1000414 - Council Solutions - submission

Thank you for the opportunity to comment on the application by Council Solutions to collaboratively procure waste collection services with their four partner metropolitan Adelaide councils (application AA1000414).

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 the South Australia's Strategic Plan¹ target to reduce waste to landfill by 35% by 2020 and the South Australia's Waste Strategy 2015-2020² vision of a resource efficient economy with a culture enabling the community, businesses and institutions to strengthen zero waste strategies. In particular the application has the potential to result in:

- reduced waste production by better informed ratepayers
- recyclables that are less contaminated and better management of collected wastes
- reduced transport related air and noise pollution from more efficient collection services, and
- 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
- 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:

¹ <http://saplan.org.au/targets/67-zero-waste>

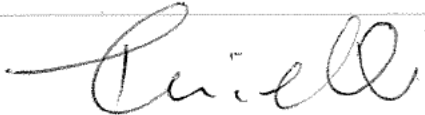
² [https://www.greenindustries.sa.gov.au/literature/165440/South Australia's Waste Strategy 2015-2020](https://www.greenindustries.sa.gov.au/literature/165440/South%20Australia's%20Waste%20Strategy%202015-2020)

- 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.

For further information on this matter, please contact Sam Wade, [REDACTED] or (08) 8463 3747.

Yours sincerely



Tony Circelli

**CHIEF EXECUTIVE
ENVIRONMENT PROTECTION AUTHORITY**

Date: 20 April 2018