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Mr David Jones / Ms Tessa Cramond
General Manager, Adjudication / Analyst, Adjudication
Merger and Authorisation Review Division
Australian Competition and Consumer Commission

Via email: adjudication@accc.gov.au

RE: AA1000414 - Council Solutions - submission

Dear Mr Jones / Ms Cramond

Thank you for the opportunity to comment on the application by Council Solutions and the Cities of Adelaide, Charles Sturt, Marion and Port Adelaide Enfield (application AA1000414) to collaboratively procure Waste Collection Services.

Green Industries SA (GISA) helps develop the green economy in response to the demand for clean and green produce, and the reduction of emissions to air, water and soil from industry. Green Industries SA promotes the circular economy, resource efficiency and the conservation and recovery of scarce resources. Our role includes:

- keeping South Australia at the forefront of green innovation in the waste, recycling and resource recovery sectors; and
- delivering reduced waste to landfill and increasing the State's capacity for recycling.

In 2015, GISA released *South Australia's Waste Strategy 2015-2020* (the Waste Strategy), which reflects the principles in the *Green Industries SA Act 2004*, namely:

- the waste management hierarchy
- ecologically sustainable development
- best practice methods and standards
- policy development through open dialogue and consultation.

Three targets outlined in the Waste Strategy relevant to application AA1000414 are:

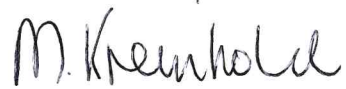
- 35% reduction in landfill disposed from 2002-03 level by 2020;
- > 5% reduction in waste generation per capita by 2020 (from 2015 baseline); and
- landfill diversion targets, including 70% diversion for metropolitan municipal solid waste (MSW) and maximised diversion to the extent practically and economically achievable for non-metropolitan MSW by 2020.

GISA notes application AA1000414 outlines benefits expected from the collaborative procurement, including environmental benefits from the increased diversion of waste from landfill. This diversion is expected to be achieved by reducing the contamination of bins from households through the use of consistent education and awareness material across the Participating Councils.

In addition, from both the application and our consultation with Council Solutions, we understand the Participating Councils will explore the introduction of RFID tags on the mobile garbage bins to streamline data collection for both their use and for feedback into GISA. These aims align with the Priorities for Action for the landfill diversion targets as outlined in the Waste Strategy.

GISA considers that the collaborative procurement by the Participating Councils and the outcomes and benefits detailed in the application AA1000414 are consistent with *South Australia's Waste Strategy for 2015-2020*.

Yours sincerely

A handwritten signature in black ink that reads "M. Kreinhold". The signature is written in a cursive style with a large, prominent initial "M".

Dr Marcia Kreinhold
Acting Chief Executive
Green Industries SA

Date: 12 April 2018