

18 October 2018



CITY OF
Port Adelaide Enfield

Sarah Court
Commissioner
Australian Competition & Consumer Commission
GPO Box 520
Melbourne
VICTORIA, 3001

adjudication@acc.gov.au

Dear Commissioner Court

Re: Application AA1000419 (Processing) and AAA1000420 (Ancillary Services)

Thank you for the opportunity for participating Council's to make a submission to the ACCC at the Pre-Decision Conference on Monday 22nd October 2018 and subsequently via this letter.

This letter is to confirm the City of Port Adelaide Enfield position that we are seeking the best possible outcomes for our community as articulated in our City Plan 2030 and our Waste Management Strategy 2018-2023.

We submit that:

- That Council Solutions does not add a layer of bureaucracy but has streamlined the tendering process and removed process duplication costs.
- Collaboration between Councils has proven to be beneficial in standardising waste service stream specifications and reporting requirements and hasn't required more work, time or added complexity to reach agreement.
- Contract Management led by Council Solutions is likely to provide benefits and streamline Council involvement as experienced in other Council Solutions procurements:
 - by reducing duplication of effort across the Participating Councils
 - by improving reporting from better data collection, monitoring and analysis.
 - by managing contractual compliance and contractor conformance.
- Councils refute WRASA's accusation that joint tendering does not reduce administration costs, joint tendering frees Council resources allowing labour to be redirected to important operational functions and reduces administrative duplication.
- This procurement has facilitated resource sharing that will continue to be solidified more than if this procurement did not take place, for example, benefits from collaboration in community education resourcing through sharing costs, delivering a consistent message and targeting identified common issues.

CIVIC CENTRE

163 St Vincent Street,
Port Adelaide SA 5015
PO Box 110,
Port Adelaide SA 5015

COUNCIL OFFICES

Enfield Library
1 Kensington Crescent, Enfield
Greenacres Library
2 Fosters Road, Greenacres

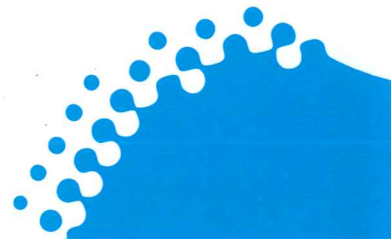
CONTACT

P (08) 8405 6600
E service@cityofpae.sa.gov.au
www.cityofpae.sa.gov.au

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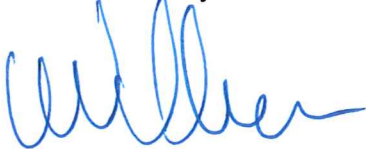
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- Councils are confident that their combined volumes and common objective will bring about improved environmental outcomes, increasing diversion from landfill to resource recovery and/or waste to energy.

If you require further information or would like to discuss this matter, please contact Leanne McEwan, Manager Community & Environmental Health leanne.mcewan@cityofpae.sa.gov.au or telephone 08 8405 6722.

Yours faithfully



Mark Withers
Chief Executive Officer