

Gilbert Jewel

From: Neville Finlay [NevilleF@camden.nsw.gov.au]
Sent: Thursday, 13 November 2003 10:51 AM
To: 'adjudication@accc.gov.au'
Subject: Camden Council's Submission to ACCC Application (A90886)



ACCC
plication_.doc (24 K)
Please find attached Camden Councils submission in relation to application
A90886 for authorisation.

Thank you.

Neville Finlay
EHO

<<ACCC Application_.doc>>

13 November, 2003

The General Manager
Adjudication Branch
Australian Competition & Consumer Commission
PO Box 119
DICKSON ACT 2602

Authorisation application lodged by The Council of Camden, Campbelltown City Council, Liverpool City Council, Wollondilly Shire Council, Wingecarribee Shire Council (A90886)

Dear Sir/Madam

Council is in receipt of your letter dated 21 October 2003 inviting Council to make written submission to the Commission regarding the likely public benefits and effects on competition of the arrangements for which authorisation is sought.

Camden Council fully supports the subject application submitted on behalf of the councils and in particular wishes to comment on the following questions raised by the Commission;

'Do you agree with the public benefits that the Councils have claimed will flow from the collective tendering arrangements?'

Yes.

Council does agree that the collective tendering arrangements will bring about numerous benefits to the general public and these have been summarised on page 29 of Attachment A to the Application For Authorisation.

'Do you agree with the comments the Councils have made about the likely public detriment flowing from the collective tendering arrangements?'

Yes.

Council does not perceive any significant public detriment flowing from the collective tendering arrangements. In fact Council believes to the contrary in that there will be public benefit rather than detriment.

'Do you consider that there might be any other detriment to the public caused by the arrangements?'

No

'Do you have any other comments on the proposed collective tendering arrangements?'

For the past three decades local communities have suffered under the regime of a monopoly of waste management dictated by Government through Waste Service NSW. The proposal before the ACCC at this time will move our communities to a level playing field with an open and fully competitive tender process. The true innovation of Australian business will be able to be applied to waste management in a holistic approach that will encompass each facet of the domestic waste streams.

It is our belief that the tender process will provide our community with options for the disposal of our wastes that are both cost effective and sustainable. As the Commission would be aware landfilling of waste is seen as old technology and there is little likelihood of any new sites being approved for the disposal of wastes. It is the express intention of the collective power of the participating councils to encourage the development of new technology that will offer the highest use of resources and the treatment of residuals in an environmentally acceptable manner.

To achieve this shift in technology, a massive financial commitment by the successful company is required and therefore there is a need to ensure that a long term, reliable feedstock is provided. The application before the Commission proposes that five councils tender for this supply which provides the critical mass of waste to make the venture viable. Should each council tender individually no one company will have the confidence that their financial commitment will be met and the outcome would undoubtedly be that each community will pay a price premium for the disposal of their waste.



Sue Morris
Acting General Manager