



Department of Environment and Conservation

Our reference: 03068
Your Reference: C2003/1363
Contact: John Harley
02 8837 6018

10 November 2003

The General Manager
Adjudications Branch
Australian Competition and Consumer Commission
PO Box 1199
DICKSON ACT 2602

FILE No:
DOC:
MARS/PRISM:

Attention: Ms Tania Mayrhofer

Dear Ms Mayrhofer

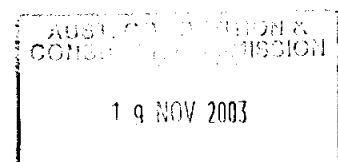
**RE: AUTHORISATION APPLICATION NO. A90886 LODGED BY THE COUNCILS
OF CAMDEN, CAMPBELLTOWN, LIVERPOOL WOLLONDILLY &
WINGECARRIBEE**

I refer to your letter of 21 October 2003 advising of the submission of the subject application for authorisation under the Trade Practices Act and the enclosed a copy of the application. It is noted in your letter that you are seeking submissions in response to the application with particular emphasis on the likely public benefit.

The Department of Environment and Conservation (DEC) was formed on 24 September 2003, combining the agencies of the NSW Environment Protection Authority, Resource NSW, the NSW National Parks and Wildlife Service and the Royal Botanic Gardens & Domain trust. The Sustainability Programs Division of DEC has assumed responsibility for delivering the programs of the former Resource NSW and delivering outcomes, which contribute to the targets identified in the state's Waste Avoidance and Resource Recovery Strategy.

The Strategy sets some challenging targets that, for the municipal sector, is seeking to increase resource recovery rates from the current 26% to 66% by 2014. This equates to recovering an extra 700,000 tonnes from the current amount disposed of by the municipal sector and suggests that this additional material will come from the increased recovery of dry recyclables and organics. The Strategy also suggests that this increase in recovery rates will necessarily be achieved, in part, by increasing the range and capacity of resource recovery technologies and practices.

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In addition to the Strategy, the Waste Avoidance and Resource Recovery Act (WARR Act) identifies the need for DEC to:

- Assist local communities to enter into arrangements for regionally-based secondary resource recovery from waste (WARR Act 6(1)(c);
- Assist in developing co-ordinated waste management services, including system and contract reform such as contracts for waste and recycling services and system co-ordination (WARR Act 6(1)(d).

The DEC has been working in partnership with the Macarthur councils to achieve these outcomes by assisting them with the regional resource processing arrangements. The DEC has also been assisting other groups of councils implement regional arrangements for the processing of the resources recovered through their domestic waste management services, where there is a demonstrated benefit in doing so, notably the Inner Sydney group of councils and the Southern Sydney group of councils, which were the subject of previous applications to the Commission.

The key aims of regional arrangements for the processing and marketing of this recovered material are improved environmental outcomes, reduced system costs, increased long term economic processing and market stability, increased transport efficiencies and reduced dependency on landfill disposal. These are all significant in terms of overall environmental improvement and will likely result in increased direct and indirect benefits to the public.

The DEC supports the subject application to the Commission and views these regional arrangements as integral to achieving some of the targets identified in the Strategy. The DEC agrees that the outcomes of the regional processing arrangement will provide increased public benefit and is committed to working with the local councils to achieve sustainable resource recovery and waste management, improved environmental outcomes and increased public benefit. The proposed regional arrangements for the processing and disposal of the waste and resources collected by these councils is clearly a step toward this goal.

Should you require any additional information, or wish to discuss any aspect of this submission, I can be contacted on 02 8837 6018 or by Email as indicated below.

Yours sincerely



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Manager, Local Government

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