



GLOBAL RENEWABLES™

The General Manager  
Adjudication Branch  
Australian Competition and Consumer Commission  
GPO Box 1199  
DICKSON ACT

6 October 2004

FILE No:
DOC:
MARS/PRISM:

Dear Sir,

**Authorisation No. A90886 for Camden Council and others**

Thank you for the opportunity to present this submission on the collaborative waste processing tendering proposal by Camden, Cambelltown, Liverpool, Wollondilly and Wingecarribee Councils (the Councils).

Global Renewables supports the application by the councils for the collaborative tendering arrangements and for the extension of the contract period to 20 years.

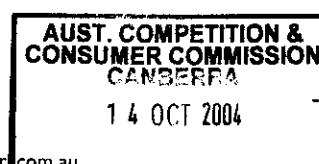
Global Renewables is building a 175,000 tonnes per year waste-to-resource facility under contract to Waste Service NSW at the Eastern Creek Waste Management Centre in Western Sydney. This Urban Resource- Reduction, Recovery, Recycling (UR-3R) Facility uses mechanical-biological waste processing to recover metals, glass, plastics and paper from domestic residual waste, and recycle the organic fraction into high quality compost and renewable energy. It will employ over 80 people, divert over 80% of the input garbage from landfill, produce no putrescible waste, and have a greenhouse gas abatement impact equivalent to taking 50,000 cars off the road. The UR-3R Facility has extensive odour control equipment, captures 100% of the biogas generated and requires no water supply or wastewater disposal.

Global Renewables has previously requested that the Commission separate the authorisation of short term landfilling arrangements from long term Alternative Waste Technology (AWT) contracts and does so in this case as well. This will allow the lead time for AWT site selection, consent and construction. In Sydney, there are really only two companies which currently provide landfilling services for Municipal Solid Waste (MSW) and if council regional AWT contracts also require landfilling in the short term, then competition from other potential players is virtually eliminated. However, there are many companies who could potentially provide an AWT facility given adequate lead time, secure waste supply and appropriate commercial and financial terms. It appears that the Councils recognise this need for adequate lead time in their letter to the Commission dated 31 August 2004, but it would be helpful if the Commission's authorisation recognised the competition implications of the lead time issue.

It is likely that councils will provide the essential base load for MSW processing facilities needed to ensure the economies of scale required to make AWT gate prices low enough to compete for commercial and industrial putrescible wastes against landfills with much lower environmental standards. The regional tendering arrangements being developed by the northern and south-western Sydney councils are thus of critical importance to improved environmental and competitive performance in these regions.

GLOBAL RENEWABLES

GRL Investments Pty Limited ACN 103 933 802  
Level 3, Suite 1, 105 Pitt Street, Sydney, NSW 2000, Australia  
Telephone: 61 2 9223 8099 Facsimile: 61 2 9232 2477 Website: [www.grl.com.au](http://www.grl.com.au)



I would also like to address some incorrect assertions in the Waste Contractors and Recyclers Association of NSW submission of 27 September. Waste Service NSW is not the owner of "the only Alternative Waste Processing Plant" in "the greater Sydney area for the receipt of Solid Waste Class 1". I believe the submission is referring to the Eastern Creek UR-3R Facility which is owned by Global Renewables. While the base load capacity of this facility is contracted to Waste Service NSW, Global Renewables has the right under some circumstances to seek additional waste input. Additionally, commercial putrescible wastes can be received by the Earthpower plant at Camellia.

Global Renewables is not tied to Waste Service NSW for the construction and operation of any other facilities in the Sydney region and at this stage is likely to tender for the residual waste streams for which the Councils are seeking the Commission's authorisation.

Our experience in tendering for significant scale AWT facilities is that in order to strike an affordable gate fee, there is need for the councils to offer contracts up to 20 or 25 years. We therefore wholeheartedly support the Commission's approval of the Councils' tendering their waste processing for a 20 year period or longer. If the Commission does not grant this 20 year extension, waste will continue to be disposed of into the current landfills in the Sydney region and the public benefits of achieving the State Waste Strategy's 66% landfill diversion will not be achieved.

Yours faithfully,  
GLOBAL RENEWABLES

A handwritten signature in black ink, appearing to read 'John Lawson', with a long horizontal flourish extending to the right.

John Lawson  
Manager NSW