

TOTAL ENVIRONMENT CENTRE INC.

LEVEL 2, 362 KENT STREET, SYDNEY, NSW 2000

Ph: 02 9299 5599 - 02 9299 5680 Fax 02 9299 4411



General Manager
Adjudication Branch
Australian Competition and Consumer Commission
'PO Box 1199
DICKSON ACT 2602

6 October 2004

Dear Ms Mayrhofer,

**Re: Amendment of Authorisation Application No. A90886
(Lodged by Camden, Campbelltown, Liverpool, Wingecarribee, Wollondilly Councils)**

Total Environment Centre (TEC) strongly urges the Australian Competition and Consumer Commission to ensure that resource recovery rates are guaranteed under an extended authorisation for waste and resource processing arrangements for Camden, Campbelltown, Liverpool, Wingecarribee and Wollondilly Councils.

As outlined in TEC's original submission to the application, authorisation for long term contracts attained through joint tender could lead to the lock-in of poor environmental outcomes. Without adequate conditions attached, the authorisation could result in the lock-in of municipal waste to landfill for 10 to 20 years, depending on the period of authorisation. This would cause significant loss of public benefit through the failure to use available technologies to appropriately recover resources and reduce waste.

As set out previously, TEC is concerned by the lack of prescription in the proposed tendering processes. To date, no application has indicated that the successful tenderer will be selected on the basis of specific, improved resource recovery rates. TEC therefore urges the Commission to stipulate that resource recovery rates must be specified in tenders, equal to or greater than those set out in the NSW Government's Waste Avoidance and Resource Recovery Strategy. That resource recovery rate is 66% diversion of municipal waste from landfill by 2014.

Landfill extensions, as a destination for waste while AWT infrastructure is being built, should only be approved with strict limitations. Short term landfill extensions should only be allowed for a maximum of 3 years and should be required to be linked to new or long-term AWT to meet 2014 target.

TEC also points out, once again, that there are vast differences between the various types of technologies that are being described as Alternative Waste Technology (AWT). It is critical that the Commission takes into account the distinction between bio-reactor landfills that merely siphon off methane gas, and high quality technologies that recover up to 80% of resources. The lock-in of waste to bioreactor landfill labeled AWT would result in a vastly reduced public benefit due to the waste of resources.

The extended time-frame requested by the applicants makes it even more critical that the ACCC requires the adoption of targets for resource recovery, and recognise the staggered timing involved in achieving those targets.

Yours sincerely,
(signed)
Jeff Angel