

FILE No.
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REMONDIS®

The General Manager
Adjudication Branch
Australian Competition and Consumer Commission
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Canberra ACT 2601

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15 August 2008

Dear Sir/Madam

RE: INNER SYDNEY WASTE MANAGEMENT GROUP OF COUNCILS APPLICATION FOR AUTHORIZATION – A91096 – INTERESTED PARTY CONSULTATION

- Remondis believes that the submission by the Councils if approved will bring benefits to the collection, transport and treatment of waste and avoid substantial organic and recyclable resources finding its way to landfill.
- If the proposed arrangements are not approved, the choices for the Inner City Councils are limited. Individual Councils seeking environmental benefits will only be able to access established providers based on incremental volumes and with technologies that do not necessarily fit with what the Councils want to achieve in their submission. New entrants with proven and innovative solutions will not be able to compete and provide alternate choices.

Under the proposed arrangements, Councils are looking at co-collection of garden and food organics as opposed to just green organics processing or processing of some food organics mixed in with other household solid waste. Councils' objective is certainly deliverable if there is sufficient feedstock material. The volumes indicated (40,000 TPA) makes this a viable proposition. However sufficient time needs to be given to new entrants to obtain the necessary approvals, seek sites, undertake public consultation, and to construct the facility. We believe this will take 24 to 36 months for new entrants such as Remondis that currently do not have existing and approved waste processing sites within reasonable proximity to the Councils but have proven capabilities to deliver these outcomes.

AUSTRALIAN COMPETITION &
CONSUMER COMMISSION
CANBERRA
21 AUG 2008

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Councils will achieve an increase in competitive bids, receive a variety of technical solutions and be in a position to evaluate current and new providers on a level playing field if they are able to provide or nominate a site within their jurisdiction under commercial and environmental terms for all interested parties. Waste will then be treated locally, provide local employment and reduce the carbon footprint. Remondis recognizes that such sites may be difficult to find in the Inner Sydney region.

- There are significant savings to Councils in a regional arrangement not only for the administration of their contract but from the benefits on the prices they will get from the potential providers as a result of the certainty of supply, volume and the term of the contract.
- Landfilling options are unsustainable and the move to technology is supported. Reduction in climate change impacts need to be advanced. Technology solutions in both waste processing and transport will significantly reduce the carbon footprint for the community. The scale proposed is sufficient and enables proponents to develop and improve on the environmental outcomes that the community want.

Yours sincerely



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