



Your ref: AA1000587

9 March 2022

Recycling & Recovery

Ms Susie Black
Director
Competition Exemptions
Australian Competition & Consumer Commission

By email: exemptions@accc.gov.au

Dear Ms Black

**RE: Eastern Metropolitan Regional Council & Ors - application for authorisation
Response to ACCC Draft Determination**

SUEZ Recycling & Recovery Pty Ltd is disappointed with the ACCC's Draft Determination conclusions and proposal to approve the Eastern Metropolitan Regional Council, the City of Bayswater, the Town of Bassendean and the Shire of Mundaring's application for authorisation (AA1000587) (**Application**) to establish a Regional Waste Collection Service as described in the Application.

SUEZ makes this further submission in support of its view that the ACCC should deny the Application. Terms which are defined in the ACCC's Draft Determination (**Draft Determination**) have the same meaning when used in this submission.

1. EXECUTIVE SUMMARY

The ACCC has concluded that the Proposed Conduct is likely to result in a 'small' net public benefit, as a consequence of asserted transaction cost savings and environmental benefits. Taken as a whole, SUEZ does not agree that the Applicants have demonstrated that the Proposed Conduct will lead to a net public benefit. SUEZ's position is that the claimed public benefits are so marginal and theoretical that in practice they are unlikely to be realised, and certainly will not outweigh the real and practical public detriments associated with the Proposed Conduct.

Fundamentally, the Proposed Conduct will exclude waste service providers, like SUEZ, from tendering for and supplying services to the Participating Councils until at least 2033. We contend that this reduction in competition between waste service providers is likely to lead to increased prices and reduced service levels. This is particularly so where the EMRC will be appointed to exclusively provide the relevant services, without itself having engaged in any competitive process in order to win the work.

2. ABOUT SUEZ

SUEZ has significant experience delivering waste collection services to Perth metropolitan councils. SUEZ currently provide kerbside collections services to 14 Perth councils; collecting some 70,000 bins per day. We leverage our substantial expertise and new technologies to provide smarter, more sustainable collection services. We are well-placed to provide a submission on the Proposed Conduct as we know how waste collection services work, how and why costs are incurred, and how pricing for these types of services work.

3. CLAIMED PUBLIC BENEFITS ARE INSIGNIFICANT

3.1 No real environmental benefits

The Draft Determination states that the ACCC:

*'...considers that the Proposed Conduct is likely to result in a public benefit in the form of some environmental benefits arising from more consistent education services, resulting in increased diversion of waste from landfill.'*¹

The ACCC has, in our view correctly, declined to accept the Applicants' flawed suggestion that the efficient use of collection vehicles would mean that the Proposed Conduct would lead to reduced carbon emissions.² As a consequence, and for the sake of clarity, the asserted environmental benefit of the Proposed Conduct is limited to the education of residents – that is, the environmental benefits associated with educating residents about which materials to put into a recycling bin, so as to divert waste from landfill.

We agree that there are benefits to this type of education, however we consider it highly unlikely that the Proposed Conduct will actually deliver better education services than would be provided without the Proposed Conduct. This is for the following reasons:

- (a) The WA Waste Authority (a State Government body implementing the Waste Avoidance and Resource Recovery Strategy) already runs the WasteSorted and Better Bins Programs. This is acknowledged by the ACCC in the Draft Determination.³ There is nothing to indicate that the EMRC can or would deliver better education services to residents than those provided by the WA Waste Authority.
- (b) The EMRC already provides education services to member councils as part of its existing disposal services.⁴ Why these education services would improve or be different as part of the Proposed Conduct is not clear.
- (c) The relevant education services may be more effective when they are tailored to the unique requirements of the residents and the demographics in a particular council. The Participating Councils have different unique requirements and demographics – for example Bayswater and Bassendean are both inner city council areas, whereas Mundaring is a rural council area. We

¹ Draft Determination, [3.44].

² Draft Determination, [3.43]; Application (as amended), p 33.

³ Draft Determination, [3.40].

⁴ The EMRC's member councils are already paying a 'Comprehensive Waste Education Strategy' levy of \$4.50 per tonne to dispose of general waste and FOGO at the EMRC's facilities. Further, the EMRC 2021-22 budget outlines an estimated \$493,048 income and \$698,636 expenditure for Stakeholder Waste Education. See EMRC, Financial Statements 2021/2022 Budget, available at <https://www.emrc.org.au/documents/1321/20212022-annual-budget>.

accordingly consider it unlikely that the proposed 'consistent' education services will be more effective than the current education services provided.

Our view is that the public benefit of the education program proposed by the EMRC will be very minimal, if there is any at all. There is no question that any such benefit will be outweighed by the concerns about reduced competition.

It is also relevant that the ACCC has considered the Proposed Conduct by reference to the Perth metropolitan area, noting that the Proposed Conduct only affects 7% of households in that area. Presumably, as a consequence, any lessening of competition in that broad geographic market would not be substantial. Using the same reasoning, if residents in 7% of households in Perth are educated more about contamination in bins, then any environmental benefits arising from that education are unlikely to be meaningful.

In respect of environmental benefits, it is also relevant that the Proposed Conduct will exclude private sector operators. It is private sector operators, such as SUEZ, which have significant research and development budgets and genuine economies of scale that could be leveraged to implement real environmental benefits. By way of example, SUEZ operated WA's first Electric Waste Vehicle in 2018 and continues investing in research and development regarding electric vehicles, and is running trials in Europe for hydrogen collection vehicles. In WA, SUEZ invests heavily in innovative collection vehicle technology including real-time access to truck cameras, automated contamination letters to properties, and real-time service confirmation. SUEZ is also involved in large scale energy-from-waste projects, including the East Rockingham Waste to Energy Project in Perth, which will have a more tangible impact on the diversion of waste from landfill.

3.2 No real transaction cost savings

The ACCC states that the Proposed Conduct would likely result in 'small transaction cost savings'.⁵ We accept that a joint negotiation in the form proposed by the Participating Councils, enabling them to share the transaction costs of negotiating, monitoring and enforcing the arrangement with the EMRC, could theoretically result in cost savings for the Participating Councils, when compared to a series of bilateral negotiations with different waste service providers. We consider, however, that such transaction cost savings are in practical terms likely to be minimal (if they eventuate at all), primarily because the WALGA Preferred Supplier Panel arrangement is already in place. The WALGA Preferred Supplier Panel arrangement is specifically designed to keep these types of transaction costs as low as possible for individual councils. In the event that there were transaction cost savings they would be very minor, 'one-off' savings, and in our view they would not offset the public detriments set out below.

It is also possible that transaction costs will increase as a consequence of the Proposed Conduct, given that it will require several councils to work together, reach agreement and resolve matters (as opposed to one council independently deciding on particular actions). This need for additional internal coordination may add an administrative burden, outweighing any potential transaction cost savings.

The Applicants have also taken the position that *'in the absence of the Proposed Conduct, the EMRC and/or its member Councils would be required to revert to the costly and time-consuming process of tendering for waste services.'*⁶ Public sector procurement processes (which require bidders to submit competitive pricing and improved service options in order to win work) typically lead to increased

⁵ Draft Determination, [3.19].

⁶ Application (as amended), p 29.

competition, lower prices, and better outcomes for councils. Our view is that the competitive process should not be criticised on the basis that it involves time and costs. Further, councils are regardless required to exercise appropriate due diligence to ensure that they are procuring services in a prudent way and in a manner that satisfies their statutory obligations. As a consequence, the Participating Councils cannot, by the Proposed Conduct, eliminate the process of evaluating and assessing the way in which they procure services for residents.

4. PUBLIC DETRIMENTS ARE SIGNIFICANT

4.1 Overview of key public detriments

SUEZ does not consider that there are any real public benefits associated with the Proposed Conduct. To the extent that the asserted benefits of transaction cost savings and education services arose, they would not be outweighed by:

- (a) the likelihood of higher collection service prices, which will ultimately be borne by residents;
- (b) the reduction in competition as a consequence of the Proposed Conduct; and
- (c) the real risk of a reduction in the level of service that councils and residents will receive in circumstances where the EMRC is untested, and has been appointed as an exclusive service provider without any competitive tender process or prior experience.

4.2 Increased prices

The Draft Determination states that the ACCC does not have sufficient evidence to conclude that the EMRC's costs of collection services would be lower, overall, than the private sector over the modelled period (2023 to 2033).⁷ In circumstances where the Applicants have made extensive submissions to the ACCC concerning the collection services, it seems to us that it is reasonable to draw the conclusion that there is no evidence which would substantiate the position that the EMRC's prices for the collection services will be lower than the private sector. Such a conclusion is in line with our own analysis.

We are strongly of the view that the Proposed Conduct may lead to higher prices for residents of Participating Councils. As the Applicants have provided the ACCC with confidential price modelling, SUEZ cannot provide specific comments on the feasibility of the proposed EMRC pricing. However, we make the following observations:

- (a) **The EMRC will need to pass on the full cost base as the services are being established.** Collection services are typically modelled as a cost per service to collect residential household bins, regardless of whether the household leaves out its bins for collection.⁸ Per service pricing is typically modelled on the basis of the cost of trucks and equipment, plus labour, plus administrative costs (such as, depending on the particular circumstances, a depot lease, a call centre and any dedicated staff). In respect of the Proposed Conduct, each of the relevant services that the EMRC will provide are being established.⁹ As these services are not currently

⁷ Draft Determination, [3.34].

⁸ More rarely and at the request of a particular council these services can be modelled as a cost per bin lift.

⁹ The City of Swan was going to provide the initial base fleet and support services, but now these initial set-up costs must be borne by the Participating Councils. See Draft Determination, [3.24].

set-up, then our analysis is that the full cost base (for example, the cost of trucks and equipment and so on) will need to be passed on to the relevant councils.

- (b) **No bundled prices may lead to higher prices.** Suppliers of multiple waste services (such as collections, transfer stations, material recovery facility and processing/disposal) may choose to provide bundled pricing for collections and processing/disposal services in order to secure both collections and processing/disposal work as part of a competitive tender process. For this reason, councils often seek to maximise price savings by tendering waste services together, but councils also maintain maximum flexibility by tendering services as separable portions in case there is a price advantage for them in doing so.

SUEZ provided a bundled collections and processing rate for commingled recyclables in its current contract with the Town of Bassendean. If the Application is approved, SUEZ points out that Participating Councils would not be able to avail themselves of any bundled rate discounts for commingled recyclables collections and processing. The EMRC does not currently operate a material recovery facility (MRF), and would be required to subcontract recyclables processing to a commercial provider at then-current commercial rates, being either SUEZ, Cleanaway or the Resource Recovery Group (formerly known as the Southern Metropolitan Regional Council, or SMRC) which currently operate MRFs in the Perth metropolitan area.¹⁰

- (c) **Prices are unlikely to be lower because of lighter bins or optimised routes.** SUEZ does not agree with the Applicants' suggestion that lighter bins or purported optimisation of service routes would lead to a lower cost per service.¹¹ We consider it unlikely that there would be any cost savings, and certainly not cost savings which are substantial enough to meaningfully reduce service rates over the 10 year authorisation period.
- (d) **A competitive process is more likely to lead to competitive pricing.** The EMRC has been appointed to exclusively provide the relevant services to the Participating Councils, without itself having engaged in any competitive process in order to win the work. It is trite to say that a competitive process to be the exclusive provider (that is, competition *for* the market in circumstances where there will be no competition *in* the market)¹² is more likely to lead to lower pricing for the relevant services.¹³ Ultimately, higher prices may be passed on to residents via council rates.

4.3 Defining the market to consider the impact on competition

The ACCC has considered the Proposed Conduct by reference to the Perth metropolitan area.¹⁴ This market definition is important because the ACCC then ultimately concludes that as the Participating Councils represent only 7% of all Perth households, then there are sufficient other opportunities for waste service providers to remain active and, presumably (although this is not expressly stated), that

¹⁰ SUEZ also questions how the EMRC has been able to accurately model pricing for commingled recyclables collections in light of the bundled pricing provided by private sector providers which is subsidised by commodity sales.

¹¹ Draft Determination, [3.34].

¹² See *Stirling Harbour Services Pty Ltd v Bunbury Port Authority* [2000] FCA 1381.

¹³ It is notable that the EMRC's modelling, as referred to in the Draft Determination (at [3.34]) states that the 'EMRC's service will be more expensive for Bassendean and Bayswater for all 3 streams'. Note that the streams referred to are general waste, recycling and FOGO collection services.

¹⁴ Draft Determination, [3.7].

any lessening of competition as a result of the Proposed Conduct is not *substantial* given the low percentage of households in the defined market which are affected.

SUEZ again¹⁵ submits that the entire Perth metropolitan region is not an appropriate area for analysis of the Proposed Conduct. SUEZ considers that in this instance the geographical area occupied by the three Participating Councils together or alternatively, the entire geographical area serviced by the EMRC as part of the Proposed Conduct, is a more appropriate demarcation.

The geographic dimension of a market should be defined by reference to the area in which buyers and sellers compete – as a starting point it is necessary to look at the '*location of customers and the place where sales take place*'.¹⁶ It is the area where there is '*potential close competition in particular goods and/or services and their substitutes*'.¹⁷ Further, when considering the relevant market the analysis should not be '*divorced from the commercial context of the conduct in question*'.¹⁸

In respect of the Proposed Conduct, the customers which are relevant are the Participating Councils and their residents. Further, the Proposed Conduct will prevent private operators from providing services in a discrete area – that is, the area proposed to be serviced by the EMRC. In these circumstances, we consider that the Proposed Conduct should be assessed by reference to a narrower market – that is, the market where business will actually be affected. If competition is examined in this narrower market it is clear that the Proposed Conduct will have a significant impact on competition as it will exclude all providers, except for one, from providing the relevant waste services.

4.4 Reduction in competition

Even if the Perth metropolitan area is taken as the correct geographical market, then our view is that the Proposed Conduct will regardless lead to a meaningful reduction in competition, including for the following reasons:

- (a) **There are only 14 councils remaining in Perth which are fully contestable.** We query the comments in the Draft Determination¹⁹ that because there are only three Participating Councils, there are presumably '*26 other councils remaining*' for operators to tender for work. In fact, of these 26 councils, there are 5 which perform all their collection services in-house,²⁰ and 7 which perform part of their collection services in-house,²¹ so there are in fact only 14 councils 'remaining.' Further, in relation to the statement in the Draft Determination that the Participating Councils represent 7% of rateable properties in the Perth metropolitan region,²² again there is no clear distinction between councils that tender their collections services, and those councils that keep some or all of their collections services in-house. If councils that retain all in-house collection services are excluded, the Participating Councils in fact represent a higher proportion of the Perth metropolitan market. The spreadsheet at Schedule 1 shows this analysis.

¹⁵ See submission by SUEZ to the ACCC dated 19 November 2021.

¹⁶ *Re Fortescue Metals Group Ltd* (2010) 271 ALR 256.

¹⁷ *Queensland Wire Industries Pty Ltd v Broken Hill Pty Co Ltd* [1989] HCA 6.

¹⁸ *Air New Zealand Ltd v ACCC* [2017] HCA 21.

¹⁹ Draft Determination, [3.56].

²⁰ City of Canning, City of Cockburn, City of Melville, City of Subiaco and City of Swan.

²¹ City of Armadale, City of Gosnells, City of Perth, City of Rockingham, City of Stirling, City of Vincent and City of Wanneroo.

²² Draft Determination, [3.56].

- (b) **Exit of smaller waste services providers.** The ACCC notes²³ that the Proposed Conduct could remove two viable competitors from a rural council area, being Volich and Steann from the Shire of Mundaring. As far as SUEZ is aware, Volich does not operate generally in the Perth metropolitan area and the competitive advantage that Volich offers over other private sector providers like SUEZ is that it is locally situated in a large rural area. We consider that Volich and Steann have a good chance of maintaining their contracts when they come up for tender (absent the Proposed Conduct). With the Proposed Conduct, we query the extent to which these operators will be in a position to compete in the broader Perth metropolitan area and whether they may exit the market if the Application is successful.
- (c) **Ten years is a significant period in the relevant circumstances.** In circumstances where the Application permits a local government body to exclusively provide services to the Participating Councils, without any competitive tender process having taken place, and with no clear price escalation controls, we consider that ten years is a long period. The independent market review to be carried out at five years will not necessarily provide accurate results as this is not a true tender/competitive process, and other providers will not be incentivised to provide their best prices to a competitor for a 'benchmarking' process that only benefits the EMRC.
- (d) **Lessening of competition.** The ACCC states that the sponsoring of a new supplier would not usually be characterised as a '*lessening of competition*',²⁴ however there has been no competitive process to be appointed as the sole provider of the relevant services to the Participating Councils, and the lack of competition '*for*' the market itself represents a lessening of competition.
- (e) **Potential loss of dynamic markets and impact on new entry.** A market that has a transparent pipeline of opportunities for suppliers to bid for is more likely to be dynamic when compared against a market with a single local government provider being awarded a long term exclusive contract without a competitive tender process. The Proposed Conduct may accordingly have an impact on the likelihood of new entry, as potential new entrants look for different opportunities in other areas.

4.5 Risk of reduced service levels

Providers of waste services, like SUEZ, are driven to innovate and improve because of the competitive nature of the markets that we operate in. Examples of innovation and technical improvements in waste collection services include vehicle design changes and monitoring (including integrated systems and technology to monitor vehicle movements, transit times, bin locations, speed/distance, and fatigue), improvements in compactor capability, and improvements in safety. The cost of these innovations and system improvements can be shared across SUEZ's 78 council customers Australia-wide. By way of example, in 2021 SUEZ implemented new technology that provides real time access to truck cameras providing service confirmation. In circumstances where under the Proposed Conduct the EMRC will be appointed to provide the relevant services for 10 years, without competition, the EMRC will face no incentive to innovate or to improve its services.

The Applicants state in their Application that ratepayers '*hold their respective Councils accountable for any inefficient services, including essential waste services ... holding the EMRC accountable for the*

²³ Draft Determination, [3.56].

²⁴ Draft Determination, [3.54].

service provided.'²⁵ The reality, though, is that ratepayers will not have sufficient information to judge whether services provided by the EMRC are being provided at a level that is consistent with or better than other service providers, or at a competitive price.

4.6 Proposed Conduct will not give rise to efficiencies that outweigh the impact on competition

We agree with the ACCC's comments²⁶ that a large private sector operator could achieve similar efficiencies to those which the Applicants might achieve. In this respect, it is relevant that both the City of Bayswater and the Town of Bassendean have introduced a FOGO service during the terms of their current contracts, and when the FOGO service was introduced in Bassendean, SUEZ conducted optimisation and rationalisation of service routes. We expect the same process was completed by the current contractor for Bayswater when FOGO was recently introduced. More generally, we consider that private operators with experience operating in competitive markets, and which participate in tender processes in order to secure the relevant work, are likely to be in a better position to achieve efficiencies than the EMRC.

4.7 Risk of cross-subsidisation

SUEZ understands from the EMRC's 2021-22 Budget Report²⁷ that the EMRC's commercial disposal rate is currently \$149.09 (ex GST) / tonne which is consistent with the current market rate for disposal in Perth. However, the EMRC currently charges \$187.50 (ex GST) / tonne²⁸ to member councils, which SUEZ understands includes additional charges that are recovered from member councils and not its commercial customers, being a 'Secondary Waste' charge of \$38 / tonne and a 'Comprehensive Waste Education Strategy' levy of \$4.50 / per tonne²⁹ (increased by \$1.00 or 28.5% from the previous year), which apply to FOGO and waste tipped at the EMRC facilities by member councils. There is a real question as to whether the EMRC will seek to recoup any losses from collection services from its disposal rates.

We are accordingly concerned that there may be cross-subsidisation between the collections and disposal services provided by the EMRC. If this is the case, and the EMRC can cross-subsidise its entry into competitive markets, it will be competing unfairly with private operators, which may in turn distort competition.

4.8 Duplication of services provided by local government

SUEZ appreciates that the ACCC is not the regulator or enforcer of the *Local Government Act 1995* (WA), and that the ACCC is not in a position to assess whether or not a body is duplicating services in a way which is not permitted under that legislation. From a policy perspective, however, and with reference to the public benefits test which the ACCC must apply when considering the Application, it is clear that:

²⁵ Application (as amended), p 29.

²⁶ Draft Determination, [3.35].

²⁷ EMRC, Financial Statements 2021/2022 Budget, available at <https://www.emrc.org.au/documents/1321/20212022-annual-budget> (**EMRC Financial Statements**).

²⁸ EMRC Financial Statements, p 6.

²⁹ EMRC Financial Statements, p 9.

- (a) the Parliament of WA has sought fit to pass legislation which states that a local government must satisfy itself that the services it provides do not duplicate services provided by any other person;³⁰ and
- (b) in respect of the Proposed Conduct, the services intended to be provided by the EMRC do in fact duplicate services provided by others (including SUEZ), which is contrary to the intention of the legislation.

When the legislation was introduced it was intended to provide benefits for the efficiency and effectiveness of local governments, but with 'many checks and balances',³¹ including through the provision that local governments should not duplicate the services provided by others.

4.9 Proposed Conduct is not consistent with National Competition Policy

SUEZ recognises the ACCC's position that an authorisation would not alter any existing policy settings, including in relation to the National Competition Policy. However, again, it is relevant when applying the public interest test in the *Competition and Consumer Act 2010* (Cth)³² that:

- (a) the WA Government has a *Policy on Competitive Neutrality* which states that it is not fair for government businesses to enjoy artificial competitive advantages when competing with private firms; and
- (b) the Proposed Conduct involves the EMRC (a government business) enjoying a competitive advantage against private firms by the EMRC being awarded an exclusive 10 year contract to provide waste services without other firms having the opportunity to tender for it.

4.10 Scope of the Proposed Conduct is not clear

SUEZ has read the concerns expressed by other market participants that the Proposed Conduct may 'creep' into provision of services to the commercial and industrial sector.³³ The ACCC has, reasonably, stated that it can only assess the Proposed Conduct as it is presented in the application before it.³⁴ However there is a significant inconsistency in the way in which the Proposed Conduct is described in the Application, and in the Draft Determination, in that in paragraph 3.61 of the Draft Determination the Applicants stated that the Proposed Conduct is '*restricted to domestic waste from the three Participating Councils*' (our emphasis) and that the EMRC is not proposing to expand these collections services into construction and demolition or commercial and industrial. However, paragraph 1.12 of the Draft Determination states that the intention is for the EMRC to provide a full service to Participating Councils for '*rateable properties and schools*' (our emphasis), which is clearly broader than domestic properties. For example, other rateable properties may include lunch bars, IGAs, day care centres, and Old Perth Road businesses and shops.

³⁰ *Local Government Act 1995* (WA), s 3.18(3)(b).

³¹ Western Australia Hansard, *Parliamentary Debates*, Legislative Assembly, 31 August 1995.

³² *Competition and Consumer Act 2010* (Cth), s 90(7)(b) and s 90(8).

³³ Submission of JJ Richards & Sons Pty Ltd dated 19 November 2021; and an anonymous interested party dated 24 November 2021.

³⁴ Draft Determination, [3.62].

Further, the Application states that there may be a '*progressive uptake of the [EMRC's] service by member councils*,'³⁵ however not all of the member councils of the EMRC are Applicants for the authorisation,³⁶ and so will not be in a position to jointly negotiate with the EMRC.

5. CONCLUSION

SUEZ is not able to agree that there is a net public benefit arising from the Proposed Conduct. Any public benefit, if achieved, would be marginal in nature and in SUEZ's view would not offset the public detriment of reduced competition. The Proposed Conduct would:

- (a) fail to provide any cost savings other than potentially minor transaction cost savings, while introducing the real risk of higher collection service pricing that would ultimately be borne by the Participating Councils' residents for 10 years; and
- (b) fail to provide any environmental benefits other than consistency of education services which are already priced into the EMRC's existing disposal services for member councils.

Competition should be on its merits and steps should not be taken to prevent competitors from entering or operating in a market.³⁷ The Proposed Conduct does not have an overall public benefit as it involves a government body entering into an exclusive contract for 10 years, without having entered into any competitive process to win the work, and in a way which will prevent competing suppliers of waste services from operating in the area of the Participating Councils.

SUEZ would be pleased to discuss the Application with the ACCC. If further information is sought, please contact me on [REDACTED] or [REDACTED].

Yours sincerely



Rebecca Goodwin
Residential Contracts Manager

³⁵ Application (as amended), p 8.

³⁶ The Applicants are the EMRC on behalf of itself and the City of Bayswater, the Town of Bassendean and the Shire of Mundaring. Member councils of the EMRC which are not applicants are the City of Swan and the City of Kalamunda.

³⁷ See, e.g. <https://www.accc.gov.au/media-release/our-economy-needs-more-competition-on-its-merits>.

Schedule 1 – Municipal collection services in Perth metropolitan area available for tender

Council name	Population					
	Total	Share	Excluding households where waste collection services are performed either:			
			(a) Fully in-house by the council		(b) Partially in-house by the council	
			Total	Share	Total	Share
'Participating Councils'						
Bassendean , Town of	15,739	0.8%	15,739	1.1%	15,739	2.5%
Bayswater , City of	68,232	3.5%	68,232	4.7%	68,232	10.9%
Mundaring , Shire of	39,139	2.0%	39,139	2.7%	39,139	6.2%
TOTAL	123,110	6.4%³⁸	123,110	8.4%³⁹	123,110	19.6%⁴⁰

Councils that retain <u>all</u> collections services in-house (i.e. do not tender waste collection services)						
Canning , City of	92,965	4.8%	0	0%	0	0%
Cockburn , City of	112,165	5.8%	0	0%	0	0%
Melville , City of	101,940	5.3%	0	0%	0	0%
Subiaco , City of	17,106	0.9%	0	0%	0	0%
Swan , City of	143,374	7.4%	0	0%	0	0%
TOTAL	467,550	24.3%	0	0%	0	0%

Councils that retain <u>some</u> collections services in-house (i.e. tender only some waste collection services)						
Armadale , City of	87,634	4.5%	87,634	6.0%	0	0%
Gosnells , City of	123,325	6.4%	123,325	8.4%	0	0%
Perth , City of	27,762	1.4%	27,762	1.9%	0	0%
Rockingham , City of	133,389	6.9%	133,389	9.1%	0	0%
Stirling , City of	220,249	11.4%	220,249	15.1%	0	0%
Vincent , City of	36,088	1.9%	36,088	2.5%	0	0%
Wanneroo , City of	203,679	10.6%	203,679	14.0%	0	0%
TOTAL	708,801	36.8%	708,801	48.6%	0	0%

³⁸ Represents the Participating Councils' total share of the population of rateable households.

³⁹ Represents the Participating Councils' total share of the population of rateable households when councils which retain collection services fully in-house are excluded.

⁴⁰ Represents the Participating Councils' total share of the population of rateable households when councils which retain collection services partially in-house are excluded.

<i>Councils that do not retain collections services in-house (i.e. tender all of their waste collection services)</i>						
Belmont , City of	41,510	2.2%	41,510	2.8%	41,510	6.6%
Cambridge , Town of	28,481	1.5%	28,481	2.0%	28,481	4.5%
Claremont , Town of	10,704	0.6%	10,704	0.7%	10,704	1.7%
Cottesloe , Town of	8,188	0.4%	8,188	0.6%	8,188	1.3%
East Fremantle , Town of	8,711	0.5%	8,711	0.6%	8,711	1.4%
Fremantle , City of	30,868	1.6%	30,868	2.1%	30,868	4.9%
Joondalup , City of	160,031	8.3%	160,031	11.0%	160,031	25.5%
Kalamunda , City of	58,946	3.1%	58,946	4.0%	58,946	9.4%
Kwinana , City of	43,511	2.3%	43,511	3.0%	43,511	6.9%
Mosman Park , Town of	9,067	0.5%	9,067	0.6%	9,067	1.4%
Nedlands , City of	22,554	1.2%	22,554	1.5%	22,554	3.6%
Peppermint Grove , Shire of	1,721	0.1%	1,721	0.1%	1,721	0.3%
South Perth , City of	43,554	2.3%	43,554	3.0%	43,554	6.9%
Victoria Park , Town of	36,601	1.9%	36,601	2.5%	36,601	5.8%
TOTAL	627,772	32.6%	627,772	43.0%	627,772	80.4%
TOTAL	1,927,233	100%	1,459,683	100%	627,557	100%