



Recycling & Recovery

21 October 2021

Michael Pappa
Analyst
Australian Competition & Consumer Commission
Level 17, 2 Lonsdale St
MELBOURNE VIC 3000

Via email: exemptions@acc.gov.au

Dear Mr Pappa

Thank you for the opportunity to comment on application AA1000581 lodged by the Metropolitan Waste and Resource Recovery Group (MWRRG). As an impacted stakeholder, SUEZ Recycling and Recovery (SUEZ) is pleased to make this submission regarding the update of the original authorisation which includes the establishment of a panel of suppliers of recycling sorting services.

SUEZ currently does not have a materials recycling facility (MRF) in Victoria. The current authorisation and tender terms are a concern in that they would preclude us from investing as a for-profit commercial entity. The authorisation would also impede our full participation in the Recycling Victoria – Victoria's Circular Economy Policy and Action Plan (Circular Economy). As an innovative resource recovery operation, SUEZ has a vested interest in diverting and recycling as much waste as possible from our landfills through sustainable operations which improve the environment, generate employment and deliver financial benefits.

Tender terms

The ability to enter the Victorian market, as a new MRF service provider, would be severely hampered by the periods stated in the terms of such an authorisation (3 years, with 2 + 2-year option). The 3-year term is not acceptable for any financial investment decision to proceed. We would accept a 5-year term with a further 5 + 5-year option.

SUEZ will provide a positive impact (or public benefit) with the introduction of more MRF processing capacity and competition. We will also provide tangible transactional cost savings to both MWRRG and the associated individual councils.

The negative impact (or public detriment) to the proposed authorisation lies with the existing MRF service providers standing to gain further scale as a result of the authorisation which would eventually reduce or



erode competition. History also suggests the current processing capacity in Victoria is unable to manage the demand which saw stockpiling, combustion and eventual landfilling of a commodity. Limiting the number of processors in the market will only see this potential catastrophic event occur again.

We request that more competitive terms be provided so that new market entrants can participate and have an opportunity to become a panel member for future sorting services.

If you have any questions or require further information, you are welcome to contact Peter Makris at SUEZ on [REDACTED] or [REDACTED].

Yours faithfully

[REDACTED]

Mark Globan
Infrastructure Manager – Victoria