

April 21, 2017

Chief Executive Officer,
City of Gold Coast
PO Box 5042
GCMC QLD 9729

By email - gchaveyoursay@goldcoast.qld.gov.au

Dear Mr Dale Dickson,

The National Waste and Recycling Industry Council (NWRIC) welcomes the opportunity to comment on proposed *Local Law No 20 (Waste Management) 2017*.

The NWRIC is a newly formed waste and recycling industry group comprising both national businesses and state associations. Our members represent the majority of the private market capital invested into waste and recycling assets in Australia. The NWRIC advocates on behalf of these companies.

Our core activity is to proactively engage with all of the industry's stakeholders to promote solutions to the regulatory challenges facing the sector.

On behalf of our members the Council wishes to register our concern with the establishment of proposed *Local Law No 20* - as our collective experience indicates the law could lead to a deterioration of the quality of waste and recycling services for residents and businesses in the City of Gold Coast.

The Council takes this view as it believes that the benefits expected to be gained by the City of Gold Coast from mandating and aggregating services (as detailed in the proposed *Local Law No 20*) **do not** outweigh the saving that can be created by an active competitive market.

Further, our concern with the proposed law is that it extends well beyond servicing residential domestic kerbside collection - where we recognise that aggregated services can provide benefit - to commercial waste collection.

While economies of scale have provided benefit for residential kerbside collection systems, the extensive experience of industry indicate this approach does not offer the same benefit in commercial collection markets.

It is our experience that commercial businesses are best served by competitive waste services - where competitive pricing, flexible collection systems, more recycling and up to date innovation are combined to offer the best consumer service possible.





Whilst we applaud the intention of the City of Gold Coast to improve public amenity - we note that most Councils allowing free market competition have been able to maintain very high standards of public amenity throughout Australia.

Therefore, it is our view that the introduction of *Local law No 20* may result in a deterioration in the quality and diversity of the services offered within the City of Gold Coast jurisdiction - and as such mandatory commercial collection service arrangements should not be introduced as proposed under *Local Law No 20*.

Sincerely,

Max Spedding
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