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Independent Pricing and Regulatory Tribunal PO Box K35 HAYMARKET POST SHOP NSW 1240

Dear Sir / Madam,

REVIEW OF DOMESTIC WASTE MANAGEMENT CHARGES

Ref: zw/BL

On behalf of Tamworth Regional Council, thank you for the opportunity to provide comments on IPART's Review of Domestic Waste Management Charges.

Council's submission follows.

Please contact the undersigned should you wish to discuss this matter further.

Yours faithfully

Bruce Logan Director Water and Waste

Contact:

25 March 2022



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Tamworth Regional Council

Response to the Independent Pricing and Regulatory Tribunal's Draft Report

Review of Domestic Waste Management Charges – December 2021

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1 Background

Tamworth Regional Council currently owns and operates 3 active landfills and 8 Small Vehicle Transfer Stations across the Council area servicing communities with a total population of approximately 60,000, as detailed below;

Facility Location	Community served		
Landfills			
Forest Road	Tamworth/Attunga		
Manilla	Manilla		
Barraba	Barraba		
Small Vehicle Transfer Stations			
Bendemeer	Bendemeer		
Dungowan	Dungowan		
Duri	Duri		
Kootingal	Kootingal		
Somerton	Somerton		
Niangala	Niangala		
Watson's Creek	Watson's Creek		
Nundle	Nundle/Woolomin		

2 Comments on the IPART's Review of Domestic Waste Management Charges

The elected Councillors of Tamworth Regional Council considered a report discussing the IPART's draft report – Review of Domestic Waste Management Charges, at its meeting of 22 March 2022, and resolved to make a submission to IPART **objecting to any further regulation of Domestic Waste Management (DWM) Charges** for the following reasons;

- any further regulation, or an increase of the administrative burden on local government, is not necessary for the following reasons:
 - Council's fees and charges are publicly advertised before they are adopted. Customers have the right to question the charges before they are adopted;
 - it is in the best interest of the Council and its elected representatives to explain the need for increases in DWM charges to avoid criticism;
 - Council is the closest level of government to its customers and the customers have the right, through the election process, to not support a Council or Councillors who, in their view, have supported unreasonable increases in DWM charges;
- differences in DWM charges levied by authorities across the state, including annual increases, may be required for a number of factors including:
 - the need to recover the waste levy, where applicable;

- o the number, size and location of landfills operated by an authority;
- o geographical and social factors of the LGA that affect service provision;
- o environmental objectives of the community within the LGA;
- the implementation of initiatives such as FOGO which come at considerable cost and must be paid for;
- the cost of recycling processing is highly volatile, and influenced by commodity markets and federal exportation bans placed on plastics, cardboard and paper; and
- the cost of construction and trade services in rural remote areas are considerably higher than urban areas.

As a result, applying a blanket approach, such as a waste peg will ignore several key factors that may be considered unique to each LGA.

 IPART setting individual DWM charges is considered just another administrative burden for already resource stretched Councils, for no apparent benefit. If further regulation is introduced IPART will likely require reams of information to be provided by each Council and additional community engagement, over and above that already completed as part of the annual budget process. This will take resources away from delivering services with the end result being the same, as good governance dictates Councils should already follow sound practise in calculating and setting its charges.