

CONFIDENTIAL MEETING OF THE PORT PHILLIP
CITY COUNCIL
3 FEBRUARY 2021



18. CONFIDENTIAL MATTERS

The information contained in the following Council reports is considered to be Confidential Information in accordance with Section 3 of the Local Government Act 2020.

Report no.	REPORT TITLE	CONFIDENTIAL REASONS
18.1	<i>Provision of landfill services via Metropolitan Waste and Resource Recovery Group</i>	<i>(g(ii)) private commercial information, being information provided by a business, commercial or financial undertaking that if released, would unreasonably expose the business, commercial or financial undertaking to disadvantage.</i>



18.1 PROVISION OF LANDFILL SERVICES VIA METROPOLITAN
WASTE AND RESOURCE RECOVERY GROUP

EXECUTIVE MEMBER: CHRIS CARROLL, GENERAL MANAGER, CUSTOMER, OPERATIONS
AND INFRASTRUCTURE

PREPARED BY: LACHLAN JOHNSON, EXECUTIVE MANAGER CONSTRUCTION,
CONTRACTS AND OPERATIONS

DONNA D'ALESSANDRO, MANAGER MAINTENANCE &
OPERATIONS

MAURO VELLA, COORDINATOR WASTE MANAGEMENT SERVICES

1. PURPOSE

- 1.1 To present to the outcome of the collaborative procurement process undertaken by the Metropolitan Waste and Resource Recovery Group (MWRRG) for the disposal of municipal waste.
- 1.2 To recommend that Council enter into agreements through MWRRG to provide primary and back up landfill disposal services.
- 1.3 To recommend that Council enter into an agreement through the MWRRG to provide redundancy transfer station services in the event that Council's South Melbourne Resource Recovery Centre is unable to operate.

2. EXECUTIVE SUMMARY

- 2.1 Council collects and disposes of significant volumes of waste to landfill. This waste is collected from domestic and commercial kerbside bins, public litter bins, Council's amenity services such as beach cleaning and street sweeping, and at Council's South Melbourne Resource Recovery Centre. Council provides weekly residential kerbside waste collection services to 62,588 tenements within the municipality, which collects and disposes of approximately 22,684 tonnes of household waste per annum and a further 8,209 tonnes per annum of waste from other Council services; resource recovery centre operation, litter bin collection and street and beach services.
- 2.2 Council is party to existing contractual arrangements to dispose of this material at landfill sites. These arrangements are set to conclude in the coming months.
- 2.3 The Metropolitan Waste and Resource Recovery Group (MWRRG) has recently undertaken a collaborative procurement process on behalf of the majority of metropolitan councils to secure new landfill disposal and waste transfer station services. Council has been party to this joint procurement process to secure new arrangements.
- 2.4 Council has chosen to participate in this collaborative procurement process because by amalgamating landfill volumes with other municipalities it provides opportunities for significant economies of scale. Additionally, this allows for an efficient procurement and eventual contract management processes.
- 2.5 Through the collaborative procurement process, the MWRRG has also ensured that the contractual arrangements on offer to participating local government authorities (LGAs) provide flexibility. This is particularly important given the rapidly evolving waste management sector including the impending introduction of additional services as outlined in the 2019 Victorian State Government's Recycling Victoria policy.



- 2.6 The contracts on offer will enable Council to have access to landfill services until alternative services are available. This may include a combination of reduced waste generation, increased rates of diversion through kerbside comingled recycling, separated glass stream recycling, the introduction of food organics and garden organics (FOGO) services, and advanced waste processing techniques.
- 2.7 The landfill contracts on offer are structured as either being guaranteed or non-guaranteed. A lower disposal rate is applicable if Council agrees to guarantee a minimum volume over the period of the contract. Under the guaranteed arrangement, Council would be required to provide minimum volumes until March 2025. Conversely, a high rate is applicable if the volume is not guaranteed but leaves Council with the flexibility to explore opportunities to reduce the volume of material going to landfill.
- 2.8 Considerations as to whether Council proceeds guaranteed or non-guaranteed arrangements include the roll-out of new services (separated glass recycling and FOGO), initiatives to reduce contamination and alternative processing techniques.
- 2.9 A separate major consideration on the nature of any landfill disposal agreement is the separate contractual arrangements that Council has to collect kerbside material and transport it to the landfill disposal site. The haulage of waste from the City to the landfill disposal sites is a significant component of these collection contracts. Any changes in disposal site, and the rate of disposal at that site, can have a significant impact on the collection contracts. In December 2020, Council resolved to extend the existing contractual arrangements with the current kerbside collection contractor until June 2023 subject to the procurement provisions of the new Local Government Act 2020.
- 2.10 With the significant amount of change in the waste collection space, the impending implementation of new separated glass and FOGO services that will likely increase rates of diversion away from landfilling, and the interdependency with the collection contracts, it is recommended that Council enter into non-guaranteed arrangements.
- 2.11 Following an extensive procurement evaluation process, it is recommended that Council, through the MWRRG, enter into a primary contract for landfill disposal and a secondary contract to provide redundancy in the event that the primary disposal location is unavailable. Namely, it is recommended that:
 - 2.11.1 Council enter into a participation agreement with the MWRRG and by agreement Cleanaway P/L as the non-guaranteed landfill disposal facility for a period of four (4) years with option of extension for a further contract term of two (2) x two (2) years subject to negotiation.
 - 2.11.2 Council enter into a participation agreement with the MWRRG and by agreement Hanson Landfill Services P/L as the non-guaranteed landfill disposal facility for a period of four (4) years with option of extension for a further contract term by two (2) x two (2) years subject to negotiation. This option will be used in case of emergencies if the main waste disposal facility is unavailable.
- 2.12 Entering into non-guaranteed arrangements provides Council significant flexibility but is more expensive. The premium to provide this flexibility is approximately \$178k per annum (based on an annual volume of 30,893 tonnes/annum and disposal at the primary facility).
- 2.13 The collaborative procurement process also called for proposals for transfer station or resource recovery station services. Whilst Council already operates a resource



recovery centre in South Melbourne, the collaborative procurement process offers Council the opportunity to make redundancy and future provisions if the facility is unable to be utilised. It is therefore recommended that:

- 2.13.1 Council enter into a participation agreement with the MWRRG and by agreement Citywide Service Solutions P/L for non-guaranteed access to their transfer station facility for a period of four (4) years with option of extension for a further contract term by two (2) x two (2) years subject to negotiation. This option will be used in case of emergencies if Council's resource recovery centre in South Melbourne is unable to be operated.

3. RECOMMENDATION

That Council:

- 3.1 Resolves to enter into a participation agreement with the Metropolitan Waste and Resource Recovery Group (MWRRG) and by agreement Cleanaway Pty Ltd as the non-guaranteed landfill disposal facility for a period of four years with option of extension for a further contract term of two by two years subject to negotiation to the value of \$20,161,132 excluding GST (\$22,177,245 including GST) over the initial term, for the provision of the Landfill disposal services for year one with an annually rise & fall adjustment.
- 3.2 Notes that the forecast costs on landfill disposal services exceed the allocations currently made in Council's ten-year financial plan by approximately \$616,841 over the four year period 2020/21 to 2024/25.
- 3.3 Resolves to enter into a participation agreement with the Metropolitan Waste and Resource Recovery Group (MWRRG) and by agreement Hanson Landfill Services as the non-guaranteed landfill disposal facility for a period of four years with option of extension for a further contract term of two by two years subject to negotiation to the value of \$724,434 excluding GST (\$796,877 including GST), for the provision of contingency landfill disposal services.
- 3.4 Resolves to enter into a participation agreement with the Metropolitan Waste and Resource Recovery Group (MWRRG) and by agreement Citywide Service Solutions Pty Ltd as non-guaranteed Waste Transfer Services for a period of four years with option of extension for a further contract term of two by two years subject to negotiation to the value of \$113,400 excluding GST (\$124,740 including GST), for the provision contingency waste transfer station services.

4. KEY POINTS/ISSUES

- 4.1 Council has successfully participated and operated in regional collaborative tenders for several services, including landfill disposal services and kerbside recycling materials sorting through the Metropolitan Waste Resource and Recovery Group (MWRRG). Council is currently party to collaborative procurement for kerbside recycling processing and the alternative waste processing procurement.
- 4.2 Council's existing landfill services arrangements, like 95% of metropolitan LGAs, expires in March 2021. In preparation for the replacement of these contracts, Council entered into a collaborative procurement participation agreement with the MWRRG in 2019. 30 of the 31 metropolitan LGAs have also joined in the collaborative procurement process.



- 4.3 The City of Wyndham has not joined the collaborative procurement process due to their conflict of interest as they operate and own a landfill facility.
- 4.4 The specifications for the new landfill contracts were developed in conjunction with all participating LGAs. The specifications include allowances for the considerable flux that the sector is in with the introduction of new services, new technologies and the like. This includes things such as the introduction of advanced waste processing that may be introduced to service the Melbourne metropolitan area during the contract period.
- 4.5 To cater for the likely changes in the sector over the coming years the invitation to tender was framed to provide flexibility in the contractual arrangements over an eight (8) year period. The term of the proposed contracts is a four (4) year initial term with two (2), two (2) year extension options available. The tender also called for disposal rates under guaranteed minimum volume and non-guaranteed minimum volume arrangements.
- 4.6 The tenders have been structured in a way that provides for a sequence of 'review opportunities' by participating LGAs and the MWRRG with respect to waste management and environmental initiatives as they may emerge over the contract period.
- 4.7 The MWRRG also called for submissions to provide transfer station and resource recovery centre services. Whilst Council already operates its own resource recovery centre in South Melbourne, as a party to the collaborative procurement process, it is able to exercise options for these services.
- 4.8 The following table lists the key steps in the procurement process facilitated by the MWRRG:

Date	Procedure
October 2019	Original proposal for public tender
	Preparation of specifications
16 March 2020	Tender released to the market
8 May 2020	Initial tender proposed date to close
	Tender period was extended as a result of a request from the Minister following an approach by industry to allow additional time to respond as a result of COVID-19 implications
4 June 2020	Tender closed
28 October 2020	MWRRG board approval
November 2020	Ministerial advice on the MWRRG board approval
November 2020	Briefing documents for outcome of procurement provided to participating LGA officers.

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December 2020 – February 2021	Period allotted for participating LGAs to formally consider their engagement of contracts through the MWRRG
April 2021	Slated commencement date for new contracts

- 4.9 As part of the collaborative procurement process, the MWRRG, on behalf of the participating LGAs engaged Independent probity advisors to ensure the process was independent and fair.
- 4.10 Additionally, the MWRRG sought and received approval from the Australian Competition & Consumer Commission to amalgamate the participating LGAs' landfill waste volumes. This process is required because of the scale of procurement and the ability to influence the market.
- 4.11 Whilst Council officers have been involved extensively in the development of the specifications, the Tender Evaluation Panel (TEP) was comprised of other participating LGA and MWRRG representatives. In accordance with the probity plan, all members were required to declare conflicts of interest. The TEP members were:

Name	Title
Greg Mulcahy, Metropolitan Waste Resource Recovery Group (contract management expertise)	Chairperson
Tony Rijs, Metropolitan Waste Resource Recovery Group (contract management expertise)	Non-voting
Misty Johannsen, City of Knox (contract management expertise)	Member
Phillip Roberston, City of Greater Dandenong (contract management expertise)	Member

- 4.12 Prior to the commencement of procurement, the TEP established evaluation criteria and weightings which would be used to assess the tenders. The details are listed below:

Evaluation Criteria	Weighting
Professional Competence	20%
Quality Systems for Deliverables	25%
Commercial	25%
Social Procurement Framework	10%
Local Jobs First Policy	20%



- 4.13 The purpose of the TEP was to assess submissions received and advise as to which tenderers would be suitable candidates to include on a 'Panel of Preferred Contractors' for landfill and transfer station services.
- 4.14 Participating LGAs are able to select from the Panel of Preferred Contractors and independently choose providers for landfill and transfer station services that meet their specific needs such as geographically proximity to the municipality, and the like. Participating LGAs have until February 2021 to advise the MWRRG as to which arrangements they wish to enter into.
- 4.15 The eight submissions received varied in the scope of options provided. Five (5) proposals to provide conventional landfill solutions were offered, two (2) proposals to provide transfer station services were made and two (2) proposals for alternative waste treatment were offered.
- 4.16 The following table summarises the results of the TEP's assessment of the submissions against the evaluation criteria.

Supplier	Score
Suez P/L	94.90%
Cleanaway P/L	92.17%
Citywide Service Solutions P/L (transfer station services only)	91.02%
Hanson P/L	90.13%
The City of Wyndham P/L	83.80%
REA/Solo P/L	71.52%
KTS Recycling P/L	69.87%
SBI P/L	37.72%

- 4.17 The TEP determined that the submissions by KTS Recycling P/L and SBI P/L were not viable. The other six submitters were invited to submit best and final offers (BAFOs). The table below indicates the results of the BAFO process, noting that the rates do not include the State Government landfill levy. This levy is set at \$105.90 per tonne for year one (1) with significant increases legislated for the following years.

Tender	Current Gate Fee (\$/tonne)		Guaranteed (\$/tonne – Year 1)		Non-guaranteed (\$/tonne – Year 1)	
Landfill Operators						
Cleanaway P/L	\$	37.29	\$	37.10	\$	42.76
Hanson P/L	\$	46.61	\$	50.00	\$	65.75



Tender C	\$	60.09	\$	73.10	\$	185.02
Transfer Stations						
Citywide Service Solutions P/L (transfer station services only)	\$	NA	\$	30.00	\$	30.00
Transfer station B	\$	19.20	\$	19.80	\$	19.80
Alternative Offers						
Alternative offer A	\$	34.96	\$	51.50-80.00	\$	NA
Alternative offer B	\$	NA	\$	187.65 (2023)	\$	NA

- 4.18 Price adjustments for years beyond year one are determined under a standard rise and fall cost methodology as outlined in the contract. This factors in CPI All Groups-Melbourne, 1 April annually. This applies across all the contracts evenly as such an assessment has been made on year one pricing.
- 4.19 Following the conclusion of the assessment process, the TEP determined, and the board of the MWRRG resolved that the Panel of Preferred Contractors is made up of: Citywide Service Solutions P/L, Cleanaway P/L, Hanson P/L, REA/Solo P/L, Suez P/L and The City of Wyndham P/L.
- 4.20 Following the decision of the MWRRG to set the Panel of Preferred Contractors, Council officers undertook a review of the submissions to determine the best options for the City of Port Phillip.
- 4.21 The submission from Cleanaway P/L for conventional landfill services was determined as providing the best value for Council in the short term due to the low rate of disposal and the proximity of the landfill site to the City. Cleanaway P/L identified the Melbourne Regional Landfill at Ravenhall as being the site for disposal. The site is the closest conventional landfill offer that was made in the submissions in terms of geographical proximity to the City. As such, transportation costs as part of Council's kerbside connection contracts are the lowest to transport material to this site. Alternative disposal locations offered by the submitters were either significantly further afield from the City, requiring additional transport, or posed unacceptable levels of financial risk due to future year pricing ambiguity. It was therefore determined that the Cleanaway P/L proposal represents best value for Council for primary landfill disposal.
- 4.22 Under the MWRRG Panel of Preferred Contractors arrangement, Council has the ability to enter into guaranteed or non-guaranteed contracts with providers. Guaranteed arrangements have lower rates per tonne of material disposed or transported under the agreement but parties are bound to provide these minimum volumes. Significant disincentives exist within the contracts to discourage parties from breaching these commitments. Non-guaranteed arrangements have higher rates but provide full flexibility for parties to modify their arrangements. It is not possible to split contractual arrangements and for example have part of the agreement be guaranteed and part be non-guaranteed. The guarantee runs for the full length of contractual arrangement, a four year initial term and two, two year options.



- 4.23 Ultimately, a commitment to a guaranteed arrangement for landfill disposal services would bind Council to deliver a minimum tonnage of approximately 30,000 tonnes of material per annum during the period April 2021 to March 2025. Doing so would limit the financial upside of any initiatives that Council undertakes to reduce the amount of material going to landfill. For example, if Council introduced a FOGO service that saw a reduction of 10% of kerbside material going to landfill (2,268 tonnes), it could potentially reduce the landfill costs under a non-guaranteed arrangement with Cleanaway P/L by approximately \$100,000 per annum. Such a saving would be unable to be realised
- 4.24 Council has ambitious landfill diversion targets espoused in its Don't Waste It! Waste Management Strategy (DWI). As part of that strategy, there are numerous initiatives underway, with additional services likely to be rolled out over the near term that will reduce the volume of material being sent to landfill. It is highly likely that these services will be implemented within the initial four (4) year term of the landfill disposal contract.
- 4.25 It is therefore recommended that Council enter into a non-guaranteed arrangement with Cleanaway P/L to provide landfill disposal services. Doing so over the full four (4) year initial term will cost an additional approximately \$178,000 annually in excess of a guaranteed arrangement but provides Council with the ability to realise landfill disposal savings through the initiatives outlined in DWI.
- 4.26 Of the other conventional landfill options, that offered by Hanson P/L was deemed as being the second most advantageous to Council. It was determined that the proposal from Hanson P/L provides Council with a practical back up in the event that the primary landfill disposal location at Ravenhall is unavailable.
- 4.27 Cleanaway P/L and Hanson P/L both have a have a strong history of high performance in the waste management industry. Council under the current MWRRG, landfill services contract is signed with Cleanaway P/L as a non-guarantee participant and has used the facility over the past ten-years in the case of emergencies. During the 2019 recycling crisis, when Council's recycling processor SKM Recycling P/L was shutdown, Council successfully utilised this provision with Cleanaway to dispose of material that was unable to be processed.
- 4.28 The collaborative procurement process also provides an opportunity for Council to establish service certainty for the community with regards to access for a transfer station. Two proposals were considered with the overarching consideration being accessibility for the community in the event that the South Melbourne Resource Recovery Centre is unavailable. The transfer station proposal from Citywide Service Solutions P/L offers use of the facility at Dynon Road, West Melbourne. This facility is approximately 5km from Council's own facility and is considered the most accessible for the community. It is therefore recommended that Council, through the MWRRG enter into a non-guaranteed agreement with Citywide Service Solutions P/L for access to their facility in the event that Council's own facility is inoperable.
- 4.29 In summary, it is recommended that Council enter into three separate agreements with Cleanaway P/L as primary landfill site, Hanson Landfill Services P/L as a secondary landfill tipping facility as a viable contingency, and Citywide Service Solutions P/L for transfer station waste disposal as a contingency in the case of any operational changes to the South Melbourne Resource Recovery Centre.
- 4.30 A secondary landfill facility option manages Council's risk of sanitation and amenity issues for its waste operations should the Cleanaway P/L site not be available due to



operational breakdown of plant and equipment, or any other unforeseen closure of the site for any period of time.

5. CONSULTATION AND STAKEHOLDERS

- 5.1 Consultation with participating councils commenced 2018, to develop and understand the needs of councils to manage waste into the future. All participating councils agreed that alternative waste solutions are a major priority. Other feedback provided that was included in the specifications:
- 5.2 Stakeholder (community and business) were also included as part of the development and approval of Council's waste management strategy "Don't Waste It!"

6. LEGAL AND RISK IMPLICATIONS

- 6.1 There are no foreseen legal or risk management implications. The probity plan for procurement is consistent with guidelines provided by the Victorian State Government.
- 6.2 The proposed approach of establishing a primary disposal with a secondary contingency for landfilling operations reduces the risk of interruption to this key service.
- 6.3 There is an opportunity risk that if Council does not introduce initiatives within the first four (4) years of the contract to reduce the volume of material being sent to landfill that Council will pay a premium for flexibility that is not utilised. This is deemed as being relatively unlikely given the initiatives that are already underway as part of the DWI strategy implementation.

7. FINANCIAL IMPACT

- 7.1 The annual cost increases for the contracted amounts that are listed under 4.17 are calculated from the base price per tonne of waste and includes the rise & fall amount of 1.5% as per Council's current budget guide lines and an annual 0.5 CPI increment. Under the contract, the first rise and fall adjustment occurs in year one.
- 7.2 The calculations include the increase of the State Government landfill levy, which currently is listed as \$105.90 per tonne for 2021/22 and \$125.90 for 2022/23. There is no listed pricing for the levy beyond 2023, so increases in line with CPI is included as part of the forecast calculations as this aligns with Council's ten-year financial plan.
- 7.3 The forecast for the initial four (4) year term is outlined in the following table (note: 2020/21 July-March is under Council's current contractual arrangements):

Tender	2020/21 (July-March)	2020/21 (April-June)	2021/22	2022/23	2023/24	2024/25 (end-March)	2024/25 (April – June)
Tonnage	23,169	7,723	30,892	30,892	30,892	23,169	23,169
Forecast CPI (%)	-	1.50%	1.50%	1.50%	1.90%	2.20%	2.20%
Disposal Rate at 01/04 (\$/Tonne)	\$ 42.76	\$ 43.40	\$ 44.27	\$ 45.38	\$ 46.74	\$ 46.74	\$ 48.37

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Landfill Levy (J-J) (\$/Tonne)	\$	65.90	\$	65.90	\$	105.90	\$	125.90	\$	128.29	\$	131.11	\$	131.11
Sub-Total	\$	2,336,825	\$	844,135	\$	4,617,247	\$	5,255,273	\$	5,351,041	\$	4,093,436	\$	1,372,220
Total (Ex. GST)	\$	3,180,960		\$	4,617,247	\$	5,255,273	\$	5,351,041	\$	5,465,656			
Budget/10-Year F/P Projections	\$	3,436,837		\$	4,404,279	\$	5,039,111	\$	5,131,417	\$	5,241,693			
Net Budget Impact (saving)	\$	(255,877)		\$	212,968	\$	216,163	\$	219,624	\$	223,964			

- 7.4 The total forecast spend over the initial four (4) year initial term is \$20,161,132 (Ex. GST) or \$22,177,245 (Inc. GST) including the landfill levy. Including existing contracts and an estimate for the period between the end of the initial term and the completion of the 2024/25 financial year, the total expenditure is estimated as \$23,870,177 (Ex. GST) which represents approximately \$616,841 more than the forecast budget in the ten-year financial plan. This increase is predominantly down to the significant increase in the disposal rate in year one.
- 7.5 Council has made provisions for increases in landfill disposal costs as part of its ten-year financial plan. Since the plan was updated and endorsed in mid-2020 there have been a few key changes.
- 7.6 The ten-year financial plan allowed for a \$20/tonne increase in the landfill levy on 1 January 2021 and further \$20/tonne increases on 1 July each year. This amounted to a provision of \$308,920 in the current 2020/21 financial year. The State subsequently deferred the first increase to 1 July 2021 where a double increase of \$40/tonne will be effective.
- 7.7 The ten-year financial plan made allowances for CPI level increases in landfill disposal costs.
- 7.8 Under the recommended contractual arrangements, on 1 April 2021 the fee will increase from \$34.96/tonne under the current contract to \$43.40/tonne. This represents a 26% increase well in excess of the 4.5% increase that was estimated. The impact of the increased disposal rate over the period April-June 2021 is estimated at \$53,032 over the current year budget.
- 7.9 The net impact on Council's 2020/21 budget from the delayed introduction of the landfill levy increase and the increase in disposal costs is a saving of \$255,877.
- 7.10 The impact on Council's 2021/22 budget is comprised of the deferred double landfill levy increase and the increase and the above CPI increase in the disposal rate. The effect being that Council's 2021/22 budget will require an additional \$20/tonne or \$617,840 to fund the deferred increase in the landfill levy on top of what was already assumed in the ten-year plan.



7.11 The forecast expenditure for landfill disposal will be considered as part of the 2021/22 revision to Council’s ten-year financial plan and in the preparation of the annual 2021/22 budget.

8. ENVIRONMENTAL IMPACT

8.1 The City of Port Phillip currently sends 30,893 tonnes of waste annually to landfill, the carbon impact of this is approximately 10,543 tonnes per year.

8.2 Alternative waste treatment facilities will reduce this impact and Council is part of the working group via MWRRG, to investigate future option for the use of such facility as part of the North/Western council cluster.

9. COMMUNITY IMPACT

9.1 The procurement will allow for a short-term process (four years) to provide the community with a means to dispose of household waste until an alternative solution to process waste is available.

9.2 This service strengthens Council’s ongoing commitment to a healthy and vibrant city and meeting the objectives of the new Don’t Waste It Strategy.

10. ALIGNMENT TO COUNCIL PLAN AND COUNCIL POLICY

10.1 The recommendation contained in this report support Council plan directions: Direction 3: we have smart solutions for a sustainable future: Don’t Waste It Strategy 2018-2028.

3.5 A sustained reduction in waste. Reducing waste and recycling and diversion from landfill through service innovation and facilitating community action.

10.2 Waste is one of four transformation priorities in the Council Plan.

11. IMPLEMENTATION STRATEGY

11.1 TIMELINE

Council report to endorse the City of Port Phillip participation in the collaborative procurement process	February 2021
Sign Direct Deed, Landfill Services Deed and Participation Agreement	February/March 2021
End date of current landfill contracts	31 March 2021
Commence new landfill contracts	1 April 2021

11.2 COMMUNICATION

11.2.1 Consultation was undertaken with 30 participating councils during the joint procurement process

11.2.2 The new contract was subject to a public tender process in accordance with Victorian State Government procurement policy.

11.2.3 There will be no interruption to service delivery during the change to landfill disposal facility changes.

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12. OFFICER DIRECT OR INDIRECT INTEREST

12.1 No officers involved in the preparation of this report have any direct or indirect interest in the matter.

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ATTACHMENTS Nil