

Waste & Recycling Association of South Australia Inc.

27 July 2018

Mr Gavin Jones
Director Adjudication
Australian Competition and Consumer Commission
Level 17/2 Lonsdale Street
MELBOURNE VIC 3000

Attention: Ms Tessa Cramond

By e-mail: adjudication@acc.gov.au; Tessa.Cramond@acc.gov.au

Dear Mr Jones

AA1000414 – Council Solutions – submission

Thank you for your letter of 20 July 2018 and the accompanying Draft Determination.

Our Membership is very concerned about this draft determination, and in particular the serious adverse consequences which our Members predict will flow from the granting of this Application, in tandem with the other Applications which Council Solutions have submitted.

It is of great concern that Council Solutions has totally ignored our Membership and has not at any time engaged in any realistic consultation. We believe this is symptomatic of their approach to dealing with our industry.

Also, our Membership is concerned that Council Solutions has endeavoured to adopt a “Trojan Horse” strategy with these Applications, which if approved would lead to the same detrimental outcomes which gave rise to our concerns in 2016.

With all that in mind, we request as follows:

1. The opportunity to make further submissions;
2. The convening of a pre-decision conference;
3. The opportunity to meet with the appropriate ACCC officers to further outline our concerns, and present the broad range of concerns of our diverse and varied Membership;
4. An extension of time to 24 August 2018 to make further submissions, taking into account:
 1. The Draft Determination is quite lengthy and complex, and we need additional time to consult with our Membership and canvass their views;
 2. Several of our Members have been under significant pressure dealing with issues associated with the Global Recycling Crisis; and
 3. We do not believe there will be significant prejudice to Council Solutions, taking into account their raft of Applications and their proposed timeframe for implementation.

We appreciate the deliberations of ACCC on this difficult and controversial subject, and we would like a fair opportunity to ensure that ACCC is presented with the complete picture so a fully informed decision can be made.

Please do not hesitate to contact the writer to further discuss the above.

We look forward to hearing from you in the near future.

Yours sincerely


John Fitzpatrick
Public Officer

