

21 August 2018

Ms Tessa Cramond Australian Competition and Consumer Commission Level 17, Casselden 2 Lonsdale Street **MELBOURNE VIC 3000**

Dear Tessa,

Council Solutions & Ors application for authorisation AA1000414

Corio Waste Management Pty Ltd (CWM) was established in 1996 and is one of the largest privately owned waste management companies in regional Victoria. CWM and subsidiary Western Composting Technology Pty Ltd (WCT) are headquartered in Geelong with operations in the Melbourne metropolitan area and Shepparton. The tunnel composting plant in Shepparton, opened in 2008, is focused on recycling organic waste into soil conditioner.

CWM provides a range of waste services, including hazardous and non-hazardous solid and liquid waste collection, waste treatment and disposal, materials recovery, washroom services and road sweeping. The company employs almost 60 staff, operates 40 collection vehicles and services more than 1,500 commercial and industrial, and local government customers.

The shift to large-scale centralised waste contracts by local governments only benefits the industry's larger operators. As a result, market share concentration among the industry's top four players and barriers to entry significantly increase and competition becomes increasingly limited. This will lead to less innovative solutions to deal with growing volumes of waste and higher prices for local government and private organisations across South Australia in the long-term. This trend is prohibitive to smaller companies, like CWM, looking to expand into new geographic regions.

For this reason, we strongly oppose the application.

If you would like to discuss our submission in further detail, please do not hesitate to contact me on 03 5275 9529 or mat.dickens@coriowm.com.au

Yours faithfully.

CORIO WASTE MANAGEMENT PTY. LTD.

Mat Dickens MAICD **Director & Chief Executive**