

Ms Tessa Cramond
A/g Senior Analyst Adjudication,
Merger and Authorisation Review Division ACCC
By email to adjudication@accc.gov.au

RE: COUNCIL SOLUTIONS' APPLICATION FOR AUTHORISATION AA1000414 COLLECTION SERVICES – DRAFT DETERMINATION

Dear Ms Cramond,

Regarding the above draft determination we request the National Waste Recycling Industry Council (NWRIC) be added to the list of interested parties.

The National Waste and Recycling Industry Council ([NWRIC](http://www.nwrinc.com.au)) is the representative body for national waste and recycling service providers. Its core activity is to proactively engage with all of the industry's key stakeholders to promote solutions to the challenges facing the sector.

The current members of the Council - Hanson, Cleanaway, J. J. Richards and Sons, Solo Resource Recovery, Sims Metal Management, Suez, Remondis, ResourceCo and Veolia - represent the majority of the private capital invested into waste management and recycling assets in Australia.

In reference to the *Draft Approval of Councils Solutions'* application dated 20 July to undertake tenders on behalf of a group of SA Councils, make the following request;

- 1. We seek a one month extension to the 3/8/18 deadline for submissions to allow further evidence to be lodged, and;**
- 2. We request a Pre-Decision Conference be convened to allow industry to discuss their concerns with the ACCC.**

In regard to the draft approval, we submit the aggregation of tenders in a manner which reduces competition can reduce resilience in the market for an essential service (waste collection), and diminish innovation. We welcome further correspondence on this important matter.

Sincerely,

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