

# Waste & Recycling Association of South Australia Inc.

8 September 2018

Mr Gavin Jones  
Director  
Adjudication  
Australian Competition and Consumer Commission  
23 Marcus Clarke Street  
CANBERRA ACT 2601  
www.accc.gov.au

*By e-mail: adjudication@accc.gov.au*

Dear Mr Jones

## **Council Solutions and Ors - application for authorisation AA1000414 Comments re record of proceedings at the Pre-decision Conference convened on 27 August 2018**

We take this opportunity to express our thanks to ACCC for the opportunity to participate in the recent Pre-decision Conference, and also for circulating a record which has been prepared in respect to that Conference.

Please note that I have been instructed to note the following matters regarding the record which has been circulated, and to request that the record is amended.

1. Page 2 – Scott Geer is a representative of WRASA, reference to Solo should be removed as he no longer is employed in that position.
2. Page 3 – Mike Ritchie was at the PDC representing MRA Consulting Group in its own right. Could you include an additional reference to MRA Consulting Group as a participant, and place Mr Ritchie's beneath that.
3. Page 5 – dot point 4 – the main point made at the PDC was that the “Adelaide Metropolitan Region” is the applicable geographic area used by all agencies in the State, even the RDA, which CS refer to. The Greater Metropolitan Region is a term used only in a 2030 planning document. Please changes minutes to, “The correct market within which to examine the impact of the proposed collections tender is the widely used “Adelaide Metropolitan Region” rather than the rarely used “Greater Adelaide Region argued by Council Solutions. The reasons.....”
4. Page 5 – dot point 8 – the point was made that costs per household increase above the economical range/ sweet spot of between 20,000 and 50,000 households. Therefore, the minutes should read, “...costs per households increase as contracts get larger beyond an economically optimal range of between 20,000 and 50,000 households. In this respect.....”

Please let me know if you have any queries, or require any clarification regarding the above.

Yours sincerely

**John Fitzpatrick**  
**Public Officer**



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