



WASTE CONTRACTORS &
RECYCLERS ASSOCIATION
OF N.S.W

ABN 72 805 135 472

31st July 2018

Ms Tessa Cramond
A/g Senior Analyst
Adjudication, Merger and Authorisation Review Division
ACCC

By e mail as a PDF file to adjudication@acc.gov.au

Dear Ms Cramond

**Re: Council Solutions' application for authorisation AA1000414
Collection services – draft determination**

We refer to the above request draft determination and request that the Waste Contractors & Recyclers Association of NSW ('**WCRA**') be added to the list of interested parties.

WCRA is an industrially registered body of waste management employers with 183 Members that operate across NSW & the ACT.

In reference to the Draft Approval of Councils Solutions' application dated 20 July 2018 to undertake tenders on behalf of a group of SA Councils, we wish to register the concern of WCRA at the increased prevalence of joint council applications and ACCC approvals.

There is no doubt that joint council applications for collection of waste & recyclables have an impact on competition in the waste management sector.

To this extent, WRCA requests an extension of time to allow a full assessment of the broader impacts on industry and the potential impacts of reduced long-term competition in our sector and our relevant clientele.

Worldwide, the resource recovery industry is currently struggling in the wake of the recycling crisis caused by the China Sword Policy. It is important that any further structural market changes be considered fully.

In coming weeks WCRA plans to meet with our national counterparts to discuss these matters and we hereby seek additional time to make a full response by 3rd September 2018.

To ensure that all parties have a say in this matter, we would also encourage the ACCC to convene a pre-decision conference.

Yours faithfully

Tony Khoury
Executive Director

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