

31 July 2018

Ms Tessa Cramond
Analyst, Adjudication, Mergers and Authorisation Review Division
Australian Competition and Consumer Commission

By email: adjudication@acc.gov.au
Cc: Tessa.cramond@acc.gov.au

Dear Ms Cramond

**Re: AA1000414 – Council Solutions – submission
ACCC draft determination**

We refer to the ACCC's Draft Determination of the application for authorisation received from Council Solutions on behalf of the Cities of Adelaide, Charles Sturt, Marion and Port Adelaide Enfield (Participating Councils).

In reference to this draft decision we request an extension of time to lodge a submission on behalf of the Waste & Recycling Industry Association of South Australia (WRISA). WRISA is an industry group representing companies operating in the waste, recycling, resource recovery and related support businesses in South Australia, and is a consolidation of several previously existing smaller associations.

Members of the Association are extremely concerned regarding the potential impacts of reduced long-term competition in the market, and with the industry also currently facing significant adjustments to deal with the China Sword Policy, further time is requested to consider the ACCC's interim decision.

An extension of time until 31st August 2018 is sought.

In addition, the Association requests the ACCC convene a pre-decision conference to enable further discussion on this matter.

If further information is required, please do not hesitate to contact me by email, chris@wrisa.com.au or mobile 0407 604330.

Yours Faithfully

Chris Brideson
Executive Officer