

The General Manager  
Adjudication Branch  
The Australian Competition and Consumer Commission  
PO Box 3131  
Canberra  
ACT 2601



Dear Sir / Madam

**Re: AA1000414 Council Solutions & Ors- Joint procurement, negotiation and contracting for kerbside waste collection services**

We refer to the ACCC's interim decision to grant authorisation to Council Solutions, Adelaide City Council and the Cities of Charles Sturt, Marion and Port Adelaide Enfield (the Participating Councils) to jointly procure the collection of domestic waste, recyclables and organics through kerbside collection, including the supply and maintenance of mobile garbage bins.

The Waste, Recycling Industry Association of Queensland Inc, (WRIQ) is the premier industry association in Queensland, representing organisations ranging from large multi-national organisations through to small family-operated enterprises. The Association engages with its stakeholders and advocates and informs on a wide range of legislative and regulatory issues impacting the industry.

Association members provide two thirds of Queensland's 6,432 jobs in the industry and manage more than 70% of an approximate 9 million tonnes of waste and recycling streams per year. Member investments in Queensland exceed \$1.5 billion and contribute over \$830 million in industry value added to the state economy. The sectors collective turnover exceeds \$2.15 billion annually.

In total the waste and recycling industry members provide 11,835 jobs to Queenslanders (one in every 200 jobs) and contribute 50 cents in every \$100 of the state economy, with \$825 million in wages and salaries paid, contributing \$1.5 billion annually toward Queensland's gross state product.

Central to the Associations position, respectfully, requesting an extension for submissions from industry regarding the Council Solutions Draft Determination, is to highlight to the ACCC the fundamental importance of the industry in terms of its economic and social footprint to a state economy.

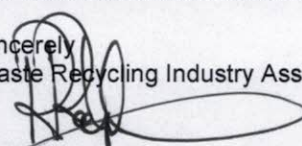
The interim determination in WRIQ's opinion fails to provide any quantum evidence of the real contribution that this joint tender outcome will deliver in terms of its economic contribution, the real job impacts and investment that will be realised to South Australian's.

Further, arguments in respect to the public benefit being proven are not clearly shown in terms of how actual tender pricing received from industry by Councils will be translated to actual household ratepayer charges and community cost reduced and efficiency gains. WRIQ argues there is clear evidence presented in Queensland that Local Government's fails in its transparency in terms of passing on the claimed benefits to ratepayers from joint tender pricing and that cross subsidisation and the expansion of anti - competition practices are prevalent and growing often masked by the claimed public benefit tests respect to waste and recycling behaviour.

The Interim determination document is substantial, and industry argues given the significance of the decision and the implications to industry an extension date of September 3 is required for a considered submission to be prepared. We also would advocate a pre-decision conference be held in the interests of genuine transparency and the ability for all parties to present and substantiate their information.

The Association thanks the ACCC for consideration of this request.

Sincerely,  
Waste Recycling Industry Association (QLD) inc

  
Rick Ralph  
Chief Executive Officer