



Australian Competition & Consumer Commission  
Level 17 Casselden, 2 Lonsdale Street,  
Melbourne Victoria 3000  
C/O: [Adjudication@accc.gov.au](mailto:Adjudication@accc.gov.au)

13 April 2018

**AA1000415 - Recyclers of South Australia Inc - Application for authorisation**

Dear Sir or Madam,

The Brewers Association of Australia is grateful for the opportunity to respond to the Recyclers Association of South Australia's application to negotiate on behalf of its "Participating Members", to negotiate collectively and to provide its Participating Members with advice (collective bargaining).

The Brewers Association represents Australia's premier beer makers. Our members – Carlton & United Breweries, Lion Beer Australia and Coopers Brewery – account for approximately 90% of all beer sales across Australia. As an industry, beer contributes more than 1% of Australia's GDP and supports over 105,000 full-time equivalent jobs.

Each of our members have substantial brewery interests in South Australia and, therefore, have exposure to potential cost increases raised through this application. These cost increases would likely have detrimental impacts for business and consumers alike.

The Brewers Association does not support the application for the following reasons:

1. We can find no public interest in the submission.
2. The submission would appear to be based around a perceived problem with the audit process (page 2 item k), which would not seem to be justification for this application.
3. There is a demonstrated and acknowledged private benefit.
4. There would appear to be a real possibility that costs associated with operating the scheme may increase through this collective negotiation. While each beverage manufacturer makes its own decisions in relation to cost increases, CDL costs tend to be passed on to consumers. The inherent risk is that consumers are likely to pay more should this application being successful.

Thank you for your consideration. Should you require more information, please do not hesitate to contact me.

Kind regards,

**Brett Heffernan**  
Chief Executive Officer  
Brewers Association of Australia