



**TREVOR HATCH
WASTE & RECYCLING**

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The man who talks rubbish responsibly

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ACCC

AA1000419 and AA100420– Council Solutions – submission

ATT: Gavin Jones

adjudication@acc.gov.au

Dear Sir,

Further to my previous letter, I again want to voice my objection to the ACCC's interim authorisation of the Council Solutions Application and tenders as they have been released. As stated previously, I wish to communicate my concern that the approval of a multi council tender of this size has the potential to annihilate 50 years of work in the Adelaide waste industry.

As a small business, I will be unable to tender for the 1 Hardwaste Contract offered in these 4 Councils as I will not be able to raise the finance required for a contract of this size. The in-truck computer requirements alone will be a huge investment for my existing vehicles and for the required reporting. I do not have the manpower or office staff to scale up to this size contract meaning this tender will only be open to large companies. The impact I am facing is losing our existing work from existing customers leaving me with trucks that I will not have work for.

I will reiterate that from my experience in hard waste collection, I believe the move to an 'at call' service for all councils will increase the service cost as it is a less efficient collection method than the current service. The on-call service results in trucks driving further and collecting less material each day which is not cost efficient to the residents.

The tender identifies processes which will impact upon any business, for example;

- No guarantee of service numbers – how do we calculate the required volumes, trucks or staff?
- We have noticed the pricing schedule for the ancillary services is very complex and the individual councils have their own unique specs.
- Responsibility for disposal gives us no way to charge additional money if the gate fee changes at the landfills. This is a huge risk to a smaller business like ours.

As a small business who currently services these councils, if I can no longer tender for their work, I cannot see that this increases competition. If the hard waste cost to residents increases by moving to an on-call service, I cannot see how this is of public benefit. The argument that only big contracts can attract competitive pricing is flawed. If that was the case how would my and other small waste businesses have survived for so long?

I ask the ACCC to understand the impact on my business and the smaller players in the industry and ask that you consider this when making your final decision.

Please contact me if you need any further information.

Can you please note that we wish to attend the Pre Decision Conferences and agree for this letter to put on the ACCC website.

Yours sincerely,

Trevor Hatch
Trevor Hatch Waste & Recycling