

The General Manager,
Adjudication Branch,
Australian Competition and Consumer Commission
P.O Box 1199
Dickson ACT 2602

Dear Sir/Madam,

RE: Exclusive Dealing notifications lodged by Seal-A-Fridge Pty Ltd and others – interested party consultation

I would like to submit my objection and comments on the granting of Exclusive Dealing, Third Line Forcing and Full Line Forcing to Seal-A-Fridge Pty Ltd.

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PUBLIC REGISTER**

Cost saving benefits claimed by the notifying parties

The likely savings are minimal, 5% to 15% as stated by the applicant. We use approx 6 metres of material costing about \$10.60 on a large domestic fridge.

The applicant states a total saving of between \$0.48 and \$1.44 on \$10.60 worth of material, not a big saving.

Where is the cost saving benefit to the public? Approx between \$0.48 and \$1.44 on a product that we charge approx \$120 to \$130 dollars. Not a huge saving by any means!

Why can't the franchisees have the right to import extrusion and magnet from the same supplier that Patrick products get it from, if they wanted too. The same quality as required by the applicants. The cost saving would be significantly higher to the franchisee and the public would also benefit substantially more, than what the applicants have proposed.

Likely detriments from the arrangement

I believe that sooner or later we will be locked into only buying Patrick Products, with no chance of having a back up supplier if Patrick Products has stock availability problems .

Hard to believe that SAF will use RBM or Austwide Plastics too supply other product lines in the future as both companies have had disputes over the last six months with the applicants, with both parties threatening court action.

Lessening of competition due to Patrick Products having monopoly over supplying Seal-A-Fridge franchises.

There would also not likely be the technical support currently received from RBM and Austwide. In short, Seal-A-Fridge operators would be less competitive than now.

If the ACCC were to continue approval for Full Line and Third Line forcing, the disadvantage to franchisees and customers would most likely far outweigh the proposed benefits.

Regards

Craig and Maria Randell

Seal-A-Fridge (Perth North)