

5th April 2016

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The General Manager
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Australian Competition and Consumer Commission
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Attention: Mr. Luke Griffin

Dear Sir,

A91530 – ST GEORGE REGION OF COUNCILS

We refer to the ACCC's letter of 18th March 2016 regarding the above application.

J.J. Richards will not provide any specific comment regarding this application as we are unable to determine whether the public benefit will out way the anti competitive detriment in this instance where a joint process has already been approved and now contract extension is being sought. We note that access to some of the applicant's argument has been restricted.

We are however, gravely concerned at the increase in the number of applications from Local Government Authorities, and approval of same by the ACCC, for joint waste collection tender processes for extended periods of time. In this application, approval by the ACCC of similar applications is used as precedent to justify the current application. It is our view that the collective impact of the growing number of applications as listed in Attachment C is reason to deny future applications. There is absolutely no doubt that a reduction in the number of waste collection tenders available in the market place, due to joint tenders and longer contract periods, will reduce competition. It will also stifle innovation and introduction of new technology which often result in improved efficiency, reduced cost, better quality of service and a positive impact on the environment (introduction of collection vehicles with improved emission standards is one of many examples). The result will be a detrimental outcome for the public in the longer term.

Thank you for your consideration of our comments.

Yours faithfully,
J.J. Richards & Sons Pty Ltd



Don Thomason
Associate Director

