

30th August 2017

The General Manager
Adjudication Branch
Australian Competition and Consumer Commission
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Attention: Mr. Theo Kelly

Dear Sir,

A91596 AND A91597 – LODDON MALLEE GROUP - SUBMISSION

We refer to the ACCC's letter of 28th August 2018 regarding the above applications.

J.J. Richards objects to the approval of interim authorization of these applications for the reasons stated below.

As we have submitted to the ACCC in response to other recent applications, we continue to be 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. We include below an extract from the ACCC's published determination in relation to a previous application.

The ACCC acknowledges the submission by JJ Richards and notes that there are a number of groups of councils around Australia which have been authorised to jointly tender and contract for waste management services. In assessing the public benefits and detriments of joint arrangements between local government authorities, the ACCC will have regard to any existing authorisations in the relevant areas of competition, as well as factors including the effect of the arrangements on competition, innovation and the introduction of new technology.

It is our view that the collective impact of the growing number of applications is reason to deny future applications. There is no doubt that a reduction in the number of waste collection tenders available in the market place, due to joint tenders and some with 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

