

18 September 2017

Australian Competition and Consumer Commission
23 Marcus Clarke Street
Canberra ACT 2601
Ref # 62782

Cleanaway Solid Waste Pty Ltd
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To whom it may concern,

Application for Authorisation – Loddon Mallee Waste and Resource Recovery Group

Thank you for the opportunity for Cleanaway Waste Management (Cleanaway) to provide a submission regarding the application for joint procurement of waste services for a group of councils that comprise the Loddon Mallee Waste and Resource Recovery region.

Cleanaway does not have an issue with the concept to jointly procure waste as we have understood the application allows Councils to decide whether to be involved or not; furthermore they can withdraw at any time. However, Cleanaway does believe introducing a joint procurement of wastes for the region as an unnecessary step for an already very competitive marketplace. Regional Victoria, in particular the Loddon Mallee region is a sizeable geographical spread and we are not entirely sure how transport efficiency improvements will be gained if Councils are locked in with only one or two suppliers.

Cleanaway would argue that under the 'enhanced competition benefit', a joint tender of this nature may have an opposite effect and be in fact be detrimental to the smaller businesses within the regional who can no longer compete for the contracts.

The length of contract is also a concern as those not successful in winning a part of the tender will be excluded for a very long time. Regional employment opportunities are scarce with many current service offerings and negotiations based on long term relationships and history. If smaller businesses are not successful in the tender process, the region may potentially be faced with further unemployment or smaller businesses disappearing altogether.

Finally, Cleanaway would expect that any municipal contracts currently held with our business across any of the 8 Councils will not be included in the procurement process for the waste services until the contracts and their extensions have ceased.

If you would like to discuss the above information, please do not hesitate to contact me on the details below.

Yours Sincerely,



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