

Your ref: AA1000566 - 30/08/2021

Attention : Nissa Burns - Contact officer

Contact phone: [REDACTED]

[exemptions@accc.gov.au](mailto:exemptions@accc.gov.au)

nissa.burns@accc.gov.au

6 September 2021

Dear Ms Burns,

**Re: AA1000566 – GWRRG and Ors – Submission**

Thank you for your time earlier today to discuss the ‘Gippswide’ Procurement process, prospectively enabling GWRRG to act on behalf of six Victorian Councils for the joint procurement of **processing services for glass and mixed recycling**.

The six Councils are: Bass Coast Shire Council, Baw Shire Council, East Gippsland Shire Council, Latrobe City Council, South Gippsland Shire Council and Wellington Shire Council (participating Council).

I am seeking to have this submission from Tambo Waste placed on the ACCC’s ‘Authorisations Public Register’ in relation to the matter.

We wish to voice concern regarding the impact that the joint procurement process will potentially have on our business and other industry operators in the region. To background my concerns, I offer the following overview of Tambo Waste’s history and operation.

- Tambo Waste Group has participated in the waste industry in Gippsland for approximately thirty years, commencing as a garbage collection operation in 1996.
- Today company’s operation spans
  - o a significant area of eastern Victoria totalling approximately 32,000km<sup>2</sup>
  - o from Traralgon, east to Mallacoota, and from Bass Straight to Mt Hotham in the north
  - o Population of 91,000
  - o Local expenditure approx. \$20.2M
- Tambo Waste holds waste collection and processing contracts with East Gippsland Shire and the Wellington Shire
- The company now employs almost 100 staff directly with these contracts
- operates a fleet of 74 collection and service vehicles and around 37 pieces of earthmoving/specialised land fill equipment
- operates the only Materials Recovery Facility (MRF) in the region, located in Bairnsdale

1. We are concerned that the proposed arrangements will only benefit the major players in the industry, who could potentially be appointed as the sole provider of services across all participating Councils. This will increase market share concentration of collection and processing in the domestic waste and recycling industry in our regional. It has the potential to exclude smaller companies, like Tambo Waste, from participation and involvement in local materials recovery.
2. Furthermore, it will also have unintended downstream impacts on commercial and industrial waste collection and municipal collection and materials recovery contracts with local government in our regions as the major players expand their geographic reach and increase their market share concentration.
3. As a successful, regional Victorian business, we are deeply concerned about the potential for us to be shut out by these arrangements. We live, work and run our business from our community, not from Sydney or Melbourne's. We have deep links within our community, providing employment to many of regional Victorians, supporting community activities, sport and social enterprises. This expertise and community connection is something that hugely benefits the recycling and materials recovery effort in our regional area and should not be passed over to serve the interests of big waste companies, many from further afield.
4. The Government says one of the biggest priorities in creating is job creation, particularly in regional Victoria. The arrangements being considered mean fewer jobs in regional Victoria and fewer opportunities for regional Victorian businesses to help deliver economic benefits for our regions.
5. This proposal fundamentally underestimates the knowledge and capabilities we have to operate the network in our respective regions. As a smaller, local business we already have many existing connections and networks with the local business community and local government bodies. The major players in the industry don't have these relationships in the region, we do.
6. Over many years Tambo Waste has progressively built its profile within the Gippsland community. We aggressively pursue a policy of 'buying local' and support the local business community. The business owner/operator, Murray Webb, is a respected businessman from a long-standing local business family with history spanning several generations in the region. Tambo Waste participates as a member of a many locally based business groups, championing the advancement of the region. The company is

known as a reliable supporter, and generous sponsor, of a large number of community organisations, clubs, events and schools, contributing a significant amount annually.

I thank you for your consideration on this matter. Please contact me if you require further information or clarification.

Yours sincerely,



**Paul Cuskelly**

General Manager

Tambo Waste Pty Ltd

P:  | M:  | E: 