

From: Colin Tsang <colin.tsang@polytrade.com.au>
Sent: Friday, 5 October 2018 1:38 PM
To: Adjudication
Subject: ACCC- Council Solutions Applications AA1000419 and AA1000420
Categories: Submission

Dear ACCC

Re: Interim Approval by ACCC of Council Solutions Applications AA1000419 and AA1000420

Our previous submission of 28/8/18 contains information that applies to the processing and disposal application to the ACCC (application no. AA1000419).

The tender documents just released show major risks for processing contractors such as :

- i. The contract term is too long, and with extensions, at councils' discretion, Polytrade can't cut the contract short if the market deteriorates further
- ii. The benchmark pricing is inadequate with some compensation for changes in paper/cardboard only. All other materials are ignored
- iii. The long period between submitting tender prices and starting the contract is high risk. Service rate reviews have significant lag after that also
- iv. Very difficult for Polytrade to address contamination issues with materials received. No rates for increased contamination.
- v. No opportunity to advise successful collector of our facility needs such as compaction ratio.

The tenders have all been advertised at the same time, which means the ability for separate companies to submit competitive bids for their area of specialization will be severely compromised. All services announced together, and alternative offers encouraged favors only the largest 2 or 3 waste service providers who can offer multiple services which will be lack of equal opportunity to all processors. This will reduce competition in the industry.

I wish our view will be considered in the future decision making.

Best Regards.,

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