

24 April 2015

General Manager
Infrastructure & Transport – Access & Pricing Branch
Australian Competition & Consumer Commission
GPO Box 520
MELBOURNE VIC 3001

By email: transport@accc.gov.au

Dear Sir/Madam

Re: Port Terminal Access (Bulk Wheat) Code of Conduct (Code) - ACCC Draft Determination dated 10 April 2015 in respect of Emerald MPT and GrainCorp Geelong and Portland

Emerald welcomes the ACCC's proposal to grant Emerald's application for exemption from the Code in respect of Melbourne Port Terminal (MPT). The exemption will allow Emerald to operate the port efficiently and cement an ongoing commitment to the Victorian grains industry.

Victoria is one of the most competitive regions in Australia for grain marketing and exporting. There is more capacity in Victoria than there is exportable grain and in the near future there will be three competing port operators vying for exporters' business.

In the interest of promoting the competitiveness of Victorian grain exports as a whole, Emerald is of the view that withdrawal of non-essential regulatory restrictions will encourage innovation in the industry, stimulate the development of commercial relationships and remove barriers to future investment.

An important step in achieving this is the equal application of regulatory supervision on port operators in Victoria. Accordingly, Emerald is supportive of an exemption from the Code for GrainCorp's Portland facility.

Emerald appreciates this opportunity to comment to the ACCC.

Yours sincerely



John Murray

Managing Director
Emerald Grain

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