

30 April 2012

Ms Kerry Leigh Taylor  
Australian Competition & Consumer Commission

By e-mail: [Andrew.Zile@acc.gov.au](mailto:Andrew.Zile@acc.gov.au)

Attention: Andrew Zile

Dear Mr Zile

**RE: Viterra's application to vary 2011 Undertaking**

We refer to your email of 23 April 2012 seeking comment on the proposed extension of the time for acceptance of the Viterra variation to its 2011 Undertaking.

Emerald supports the extended time proposed to be allowed to Viterra, with the expectation that the auction model that will ultimately be introduced by Viterra at the end of this extended period will represent an improvement on the CBH model and minimise, if not eliminate, the problems that have beset the CBH auction system this season.

We note that the practical impact of extending the time limit is that the Viterra auction system will only apply to slots available from 1 February 2013, and in the meantime the first-come-first-served system will apply. While this is not ideal, we accept that in the longer term it is more important that a robust auction model be developed for South Australian wheat exports.

Thank you for the opportunity to make a submission on this important initiative. We commend the ACCC for being able to consider a more flexible timetable to achieve the best outcome for the industry.

Regards



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