



3<sup>rd</sup> September 2019

Mr Matthew Schroder  
General Manager  
Infrastructure & Transport - Access & Pricing Branch  
ACCC  
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### **Viterra Wheat Port Exemption Assessment.**

Dear Mr Schroder

The Pastoralists and Graziers Association of WA (Inc) (PGA) is a non-profit industry organisation established in 1907, which represents primary producers in both the pastoral and agricultural regions of Western Australia.

As a state farm organization based in Western Australia, the PGA would not typically hold an opinion on port access arrangements in another State.

However, the PGA has consistently supported the complete deregulation of Australia's wheat marketing and export arrangements, and holds a genuine interest in port access arrangements for grain export.

Viterra is already subject to competition at Port Adelaide from containerised exports and a bulk ship-loader, but also to domestic grain movements from competitors' sites and directly from on-farm storages.

There will be an increase in competition in South Australia from the construction of a bulk grain facility at Lucky Bay on the Eyre Peninsula by the T Ports consortium, and their planned bulk grain facility at Wallaroo on the Yorke Peninsula.

Also, significant tonnages of South Australian grain are not exported through the Viterra port terminal system.

The South Australian Department of Primary Industries and Regions estimated the 2018/2019 South Australian grain harvest to be 5.6 million tonnes, of which Viterra exported an estimated 2.5 million to 2.6 million tonnes.

This shows that between 3 million and 3.1 million tonnes of grain bypass the Viterra bulk handling system, and are either consumed domestically within South Australia, exported using a competing South Australian supply chain or out-turned to the East Coast by road or rail.

Consequently, the PGA supports Viterra in its application for exemption from Parts 3 to 6 of the Wheat Port Access Code. The PGA does not distinguish between Viterra's individual ports.

Yours Faithfully

A handwritten signature in black ink, appearing to be 'IR' or similar initials, written in a cursive style.

Ian Randles

Policy Officer; Grains & Livestock