

3 September 2009

Mr Anthony Wing  
General Manager – Transport and General Prices Oversight  
Australian Competition and Consumer Commission  
GPO Box 520  
MELBOURNE VIC 3001

Dear Mr Wing,

### **ACCC Draft Decision on Port Access Undertakings**

The Victorian Farmers Federation (VFF) thanks you for the opportunity to respond to the Australian Competition and Consumer Commission's (ACCC's) draft decision regarding ABB, CBH and GrainCorp Limited's port access undertakings related to the export of wheat.

We thank the ACCC for taking heed of concerns raised in VFF's previous submission. The VFF is concerned about monopolistic behaviour in the grain supply chain. Lack of transparency of information restricts competition therefore at the least; stocks of grain at port should be published consistently by all providers of port terminal services.

Regarding GrainCorp Limited's undertaking the VFF agree with ACCC that it is not appropriate that the services it offers to access-seekers differ depending on whether the grain has been stored on-farm or otherwise. In the current form of its undertaking GrainCorp appears to be discriminating against grain that is delivered ex-farm without clear quantification and evidentiary justification.

Lastly we would like to formally invite you and your colleagues to VFF's Grain Marketing Roadshow held around the state in the week beginning 21 September 2009, to receive first-hand the views of growers and industry on current marketing issues. Further details are in the attached flyer.

Please contact me on 03 9207 5538 if you have any questions regarding this letter.

Regards,



Russell Amery  
VFF Grains Group President