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18 May 2011

**By email and post:** [transport@accc.gov.au](mailto:transport@accc.gov.au)

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

**Contact**  
Matthew Knox (08) 9460 1602  
Email: [matthew.knox@corrs.com.au](mailto:matthew.knox@corrs.com.au)

Dear Mr Wing

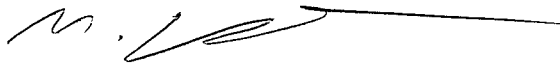
## **Request for Information - CBH Access Undertaking for Port Terminal Services**

We act for Cooperative Bulk Handling Limited (CBH).

We refer to your request for information pursuant to section 44ZZBCA(1) of the *Competition and Consumer Act 2010 (CCA)* sent to our client on the afternoon of Friday 6 May 2011.

Please find **attached** CBH's **public** response to the request for information.

Yours faithfully  
**Corrs Chambers Westgarth**



**Matthew Knox**  
Partner

### **attachments**

**copy:** Mr Richard Codling, Group General Counsel, Co-operative Bulk Handling Limited, Gayfer House, 30 Delhi Street, WEST PERTH WA 6005, by email: [Richard.Codling@cbh.com.au](mailto:Richard.Codling@cbh.com.au)

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18 May 2011

Australian Competition & Consumer Commission

**Request for Information - CBH Access Undertaking for Port  
Terminal Services**

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Cooperative Bulk Handling Limited

Public response to the ACCC's request for information  
dated 6 May 2011

# Port Terminal Services Undertaking

Dated: 18 May 2011

**CBH's public response to the ACCC's request for information  
dated 6 May 2011**

**1 Please:**

- (a) **confirm what agreement(s), if any, that a customer acquiring 'base load capacity' would be required to execute with CBH. Is the effect of the agreement(s), if any, such that CBH will supply port terminal services (i.e. 'base load capacity') on the condition that exporters will not, or will not except to a limited extent, acquire supply chain services (including grain transportation services), in whole or in part, from an alternative supplier?**

The reference to "Supply Chain Agreement" is a typographical error. The definition of "Supply Chain Agreement" should be deleted from the Port Terminal Rules. Similarly, the reference to "a Supply Chain Agreement" in clause 3.4(b) of the Port Terminal Rules should be deleted and replaced with "an agreement for the supply of Port Terminal Services".

CBH confirms that any agreement for base load capacity *will not* be offered on the condition that exporters will not, or will not except to a limited extent, acquire supply chain services (including grain transportation services), in whole or in part, from an alternative supplier.

- (b) **provide a copy of the agreement(s), if any, that exporters are required to enter into in order to be eligible to acquire 'base load capacity'.**

Base load capacity will be provided on the terms as set out in the Port Terminal Rules. The agreement for the supply of Port Terminal Services will refer back to the Port Terminal Rules (see, for example, clause 4 of the Port Terminal Services Agreement attached to Schedule 2 of the Proposed Undertaking).

**2 Clause 4.2 of the Proposed Undertaking refers to a 'PTSA' rather than a 'Supply Chain Agreement'. The term PTSA does not appear to be a defined term in either the Port Terminal Rules or the Proposed Undertaking. Please provide the correct term to be used in the Proposed Undertaking and attached schedules and an appropriate definition for that term**

The reference in clause 4.2 of the Port Terminal Rules to "PTSA" is a typographical error. The clause should refer to "an agreement for the supply of Port Terminal Services".

**Request for Information - CBH Access Undertaking for Port Terminal Services**

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- 3 Please identify the users referred to at page 14 of your submission dated 31 March 2011, which CBH indicated would be eligible for the allocation of 'base load capacity'**

[Confidential]

- 4 Please provide detail of how any 'base load capacity' that is not used by an eligible customer will be treated**

If an eligible customer does not use base load capacity they will be liable to pay the lost capacity fee (i.e. it is take or pay). As the customer has paid for that capacity then CBH will be obliged to sterilise that base load capacity. In limited circumstances, for example, if the customer ceased to operate, CBH would endeavour to make the lost capacity available to the market.

If the ACCC considered it appropriate, CBH would be agreeable to a limited process to allow base load capacity to be reallocated if enough notice is given. If the base load capacity was not picked up as spare then the take or pay charges would apply to the customer. This is discussed in further detail under question 6 below.

- 5 Please provide a detailed explanation of how the eligibility requirements for the allocation of 'base load capacity' under CBH's proposed new capacity allocation system will be applied in practice. For example, on what basis will the requisite 800,000mt 'forecast shipment schedule' be determined by CBH**

The forecast shipment schedule will be determined on the basis of information submitted by the access seeker and historical data. For example, an access seeker who previously shipped 800,000mt and submitted a forecast shipment schedule of 850,000mt would be offered base load capacity.

- 6 Please provide detailed reasons why CBH has elected to make 'base load capacity' non-transferrable and what likely impact this will have on the efficient allocation of port terminal capacity to customers in Western Australia**

It is important to distinguish auction capacity (which is tradeable) from base load capacity (which is not). These are two different products with different terms that service different segments of the market. Users who meet the criteria in clause 3 of the Port Terminal Rules, that is, large users, have access to base load capacity. All users have access to auction capacity.

All capacity is on a take or pay basis with fees and charges being paid even if no shipment takes place. Auction capacity is estimated to have a \$7/tonne lost capacity fee and base load capacity is estimated to have a \$10/tonne lost capacity fee. The higher take or pay charge for base load capacity introduces discipline into the system by ensuring that large users who acquire base load capacity only

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acquire the capacity that they need. Allowing the trading of base load capacity would remove this pricing discipline. Further, since base load capacity is acquired before the auction process:

- there may be an incentive for a user to acquire excess capacity (since they would be able to trade away any excess capacity) to the detriment of the auction process (and therefore smaller users); and
- there may be an incentive to strategically acquire excess capacity in order to "lock out" smaller users and drive up the price of capacity in the secondary market.

While this may not be an issue where there is sufficient capacity at the port terminals this cannot be guaranteed and, if the ACCC revokes the Grain Express notification, then port terminal capacity will almost certainly shrink in the short term.

If the ACCC considered it appropriate, CBH would be agreeable to a limited process to allow base load capacity to be reallocated if enough notice is given. The notice period would have to be reasonable in order to prevent the potential for gaming identified above. However, CBH does recognise that there may be legitimate situations where base load capacity may be purchased but not ultimately used. There may be difficulties in such a system due to the differences between base load and auction capacity. For example, the lack of alignment on shipping windows between base load capacity and auction capacity under the Port Terminal Rules.

**7 Please provide CBH's view on whether customers will have an incentive to hoard 'base load capacity' in order to retain their eligibility status and what impact this is likely to have on the efficient allocation of port terminal capacity to customers in Western Australia**

Customers will have no incentive to hoard base load capacity as it is being made available on a "take or pay" basis. This pricing discipline will ensure that there is efficient allocation of port capacity. Further, eligibility for base load capacity is based on tonnage *shipped*. Therefore, if an access seeker were to "hoard" base load capacity (i.e. fail to use base load capacity without a genuine reason) then they would not be eligible for base load capacity next year as they have not shipped sufficient tonnage.

**8 Please detail the extent to which CBH's proposed two-tiered capacity allocation system would discriminate in favour of access seekers with large wheat volumes, to the detriment of customers that are not likely to be eligible (e. g. access seekers with relatively small volumes of wheat).**

The question is biased in that it assumes that the two tier capacity allocation system will discriminate in favour of access seekers with large volumes. This demonstrates a fundamental misunderstanding of the system or a pre-disposition of the ACCC against CBH's Proposed Undertaking.

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The capacity allocation system consists of two distinct products, each of which have different terms and conditions and are tailored to different classes of access seekers. The base load capacity mechanism has been designed to ensure that smaller access seekers are not disadvantaged by the base load capacity mechanism for the reasons set out in questions 6 and 7 above.

- 9 Please provide detail of how CBH arrived at the 60 per cent and 40 per cent split between 'base load capacity' and auction capacity respectively**

**[Confidential]**

CBH has no interest in restricting access to CBH's ports. CBH is a cooperative which means that it exists to provide services to its members (who are also growers and therefore users of port terminal services). Further, a port relies on throughput to survive. Restricting access makes no economic sense.

- 10 Please provide detail on the extent to which the 40 per cent of port terminal capacity to be offered at auction under CBH's proposed two-tiered capacity allocation system would be sufficient to meet the overall demand from access seekers that are not eligible for 'base load capacity'. In responding to this question, please provide the relevant data in relation to the total demand for port terminal capacity at CBH's port terminals by shippers that would not have been eligible for base load capacity during the 2009/10 and 2010/11 shipping years, broken down by port terminal and shipper**

See the answer to question 9.

**[Confidential]**

- 11 Please identify any impediments to the effective operation of a secondary market for the trading of port terminal capacity in Western Australia**

CBH is not aware of any impediments to a secondary market. CBH is concerned that port terminal capacity is allocated in the most efficient manner possible in order to most effectively use the port and deliver benefits to growers who are CBH's members.

**Request for Information - CBH Access Undertaking for Port Terminal Services**

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- 12 For the 2009/10 and 2010/11 shipping years, please provide detail of each occasion, if any, where CBH did not provide approval for an application by a customer for a capacity transfer to occur under rule 7 of the 2009 Port Terminal Rules**

CBH is not aware of any instance where it did not permit the transfer of shipping capacity from one shipper to another.

- 13 In view of the 63 secondary market transfers of port terminal capacity that occurred in 2009/10, please provide detail of the reason(s) why these transfers occurred. For example, were the transfers made due to systemic issues within the auction system or due to inadequate planning by shippers**

CBH does not request reasons for transfers of capacity. Provided the applicant complies with the Port Terminal Rules CBH will transfer the capacity. Notwithstanding this, CBH is not aware of transfers that were made due to "systemic issues within the auction system".

- 14 Please provide an exhaustive definition of what constitutes 'exceptional circumstances' for the purposes of clause 10.5 of the Proposed Undertaking. In particular, please provide detail of under what specific circumstances CBH will be permitted to unilaterally vary the Port Terminal Rules**

CBH has included a fast track mechanism to vary the Port Terminal Rules in exceptional circumstances. The Proposed Undertaking defines "exceptional circumstances" as:

*"circumstances in which urgent variation/s to the Port Terminal Rules are necessary to prevent or reduce systemic or technical deficiencies or errors in the process or rules for the conduct of capacity auctions".*

This definition is narrow and covers a specific circumstance, namely the urgent need to correct any deficiencies or errors in the conduct of the capacity auctions. Put another way, it is to ensure that the auctions are run fairly and in accordance with the intended process in the Proposed Undertaking.

It is not possible to provide an exhaustive definition beyond the one above as to do so would defeat the purpose of clause 10.5 of the Proposed Undertaking. The purpose is to provide flexibility to urgently correct an error in the process rather than have the error recognised but be forced to run the capacity auction because of the time lag inherent in the amendment process. It was introduced by CBH to ensure fairness for access seekers.

CBH is not aware of every possible circumstance which may arise which would cause systemic or technical deficiencies or errors in the process or rules for the conduct of capacity auctions. Were CBH to attempt to exhaustively detail every circumstance it would remove the flexibility of the "exceptional circumstances" mechanism as inevitably some circumstances would not be included.

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CBH must also follow the standard amendment process after the exceptional circumstances amendment. Therefore, CBH cannot unfairly amend the Port Terminal Rules or otherwise avoid the amendment process.

**15 Please provide CBH's rationale for providing CBH with a unilateral ability to vary its Standard Terms for the supply of port terminal services at clause 6.1(c) of the Proposed Undertaking**

CBH's existing process for varying the standard terms provides a unilateral ability for CBH to amend. The Proposed Undertaking contains the same process with the amendment for clarity and certainty.

Any variation of the standard access terms must be consistent with the objectives in the Proposed Undertaking set out in clause 2 and clause 6.2 which provides for non discrimination. An amendment is only to the standard terms and conditions. Under the provisions of the Proposed Undertaking it is always open for a user to seek a non standard access agreement which differs from the standard terms.

To do otherwise would increase the level of regulatory intervention associated with the Proposed Undertaking for no real benefit with additional substantial costs and delay to amend. It would also decrease CBH's ability to respond to market changes in an industry that is still adapting to profound structural and regulatory changes.

**16 Please confirm that there have been no disputes raised by access seekers under clause 8 of the 2009 undertaking or under rule 17 of the 2009 Port Terminal Rules**

CBH is not aware of any disputes under clause 8 of the 2009 undertaking or under rule 17 of the 2009 Port Terminal Rules.

**17 For CBH and any other related corporate entity that was involved in the provision of port terminal services in Western Australia during the 2009/10 and 2010/11 years, please provide an organisational chart**

CBH is the only entity that was involved in the provision of port terminal services in Western Australia during the 2009/10 and 2010/11 years.

[Confidential]

**18 Please provide details of CBH's ring-fencing arrangements in relation to the sharing of information with third parties (including CBH Grain) that is received by CBH by virtue of its role as port terminal operator**

CBH does not have ring fencing arrangements which ring fence its port operations from its upcountry operations. In this regard, CBH is no different from every other port regulated by the ACCC under the *Wheat Export Marketing Act 2008* nor from its vertically integrated competitors who ship grain from other countries in the world.



**Request for Information - CBH Access Undertaking for Port Terminal Services**

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CBH does not share third party information received by CBH by virtue of its role as port terminal operator unless CBH is explicitly authorised to do so.

CBH has strict obligations of confidentiality under its agreements with access seekers (and indeed throughout the supply chain). These obligations prevent CBH from providing confidential information to third parties unless authorised (other than in well recognised circumstances, for example to provide information to the ACCC or to publish the information which forms part of the shipping stem).

CBH has already provided a detailed submission on ring fencing as part of its supporting submission (section 7). In that submission, CBH set out the reasons why ring fencing was not appropriate for the Proposed Undertaking. In summary, they were as follows.

- Under the 2009 undertaking users were able to obtain access to CBH's Port Terminal Services on acceptable terms for the 2009/2010 and 2010/2011 seasons without formal disputes or substantial complaints of breaches of the 2009 undertaking or the 2009 Port Terminal Rules.
- The 2009 undertaking (and the Proposed Undertaking) ensure that CBH cannot preferentially self deal.
- Under the 2009 undertaking and the Proposed Undertaking, CBH has maintained the robust non-discrimination provision in clause 6.2. Clause 6.3 continues to empower the ACCC to require the appointment of an auditor to examine compliance with that obligation.
- There is no evidence that CBH is discriminating in favour of its related marketing entity, CBH Grain.
- It would threaten the efficiencies generated by Grain Express (whether it was notified or not) which is predicated on the efficient integration of port and up-country functions.
- Under the Proposed Undertaking CBH must provide the ACCC with a copy of any access agreement with CBH Grain.
- It would result in substantial compliance costs for no benefit. Such costs would ultimately be passed onto customers.
- The National Competition Council has indicated that regulation of wheat export is not required.
- The Productivity Commission has indicated that ring fencing is not required.

The first three bullet points were a sufficient basis for the ACCC to be satisfied that no ring fencing was required under GrainCorp's proposed 2011 undertaking.

**Request for Information - CBH Access Undertaking for Port Terminal Services**

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**19 In the event that ring-fencing arrangements are no longer maintained by CBH, please provide detail of any information relating to port terminal operations that CBH Grain will be able to access that will not be available to other bulk wheat marketers?**

The information which CBH Grain will be able to access that will not be available to other bulk wheat marketers is CBH Grain's own confidential information provided to CBH.

In considering the appropriateness or otherwise of ring fencing measures, it is important to be clear about the kind of ring fencing measures being considered. Two options that the ACCC has raised in the past include:

- ring fencing CBH's marketing arrangements from CBH's other business activities (which is the effect of CBH's current ring fencing arrangements under Grain Express); and
- ring fencing CBH's port terminal operations from its other business activities.<sup>1</sup>

It appears from the ACCC's question that the ACCC wishes to examine the former option first before examining others.

The ring fencing arrangements under the Grain Express notification separate CBH's marketing subsidiary, CBH Grain, from CBH's other businesses. They were introduced by CBH as part of its proposal to bundle its storage, handling and transport services. The measures were adopted to address potential concerns over the change to CBH's vertically integrated business model that the Grain Express project would cause. The clearest concern was the potential for CBH to disclose confidential information to its marketing subsidiary. Like all grain storage & handling companies, CBH gathers a substantial volume of information about the grain in its system. CBH is obliged by contract with its customers to keep this information confidential to the person with entitlement to the grain but that contractual obligation was reinforced by CBH in the Grain Express notification at the request of the ACCC.

Much of this confidential information is gathered at the point of delivery into CBH's storage system. When a marketer acquires grain entitlement, CBH records the relevant information from that transaction and manages the movement of grain to the point at which grain will be outturned into that person's possession.

Most, if not all of the relevant information is acquired at the point of up-country delivery and maintained by CBH in its role as an up-country storage & handler, not as a port operator. The information concerns all grains in CBH's system, not just wheat. The main information CBH holds as a port operator is posted on the shipping stem, which is an effective means of ensuring that there is no preferential self dealing in the provision of port terminal services. In summary, it would be inappropriate to apply the Grain Express ring fencing measures as part of the

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<sup>1</sup> ACCC, Co-operative Bulk Handling Limited – Decision to Accept, 29 September 2009, p.212

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access undertaking, which is intended to apply only to the supply of port terminal services.

The significant cost of the Grain Express ring fencing arrangements is offset by the efficiencies of the Grain Express system. If the ACCC revokes the Grain Express notification, CBH may retain some of the ring fencing measures in order to assure itself of compliance with its contractual obligations and to manage risk under the CCA. However, the ACCC should not require CBH to expend resources on the formal arrangements while withdrawing immunity under the CCA that the notification confers. Once the immunity is removed, CBH's contractual obligations and the CCA are sufficient to address any concerns that were previously the subject of the ring fencing arrangements.

The issue for the Proposed Undertaking (which the ACCC noted in its final decision regarding the 2009 undertaking which it quoted in the Issues Paper dated 21 April 2011) are ring fencing provisions which cover CBH's *port operations* and not ring fencing provisions for CBH's up-country operations. The ACCC should not require the regulation of CBH's up-country operations through the Proposed Undertaking.

This raises the question whether CBH should be required to ring fence its port terminal operations from its up-country network. There are many reasons why this would be problematic and inefficient. Firstly, the interaction between up-country and port facilities is essential to the efficient management of the supply chain. CBH has limited labour resources and business systems. Ring fencing the port terminals would inflict substantial duplication of these resources, imposing substantial increase in costs. At the same time, separation would complicate communications and other operations between up-country and port, which would risk serious disruption to the flow of grain to port. There is also the difficulty posed for grains other than wheat, which could potentially be subject to regulation that is intended to apply to bulk wheat only.

This discussion takes place in an unusual context in which:

- CBH operates as a non-profit cooperative for the benefit of its grower members;
- there is no evidence of supra-competitive pricing, gold-plating of assets or preferential self-dealing by CBH;
- the ACCC accepted CBH's 2009 undertaking (and those of other operators) without ring fencing measures;
- the Productivity Commission has recommended against further regulation of bulk wheat exports, primarily on the basis that the costs of regulation outweigh the benefits;
- CBH has never refused a request for access to its port terminals services; and
- there have been no access disputes under the 2009 undertaking.

**Request for Information - CBH Access Undertaking for Port  
Terminal Services**

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If the ACCC requires ring fencing in this context, it will risk adding substantial costs to one of Australia's most important export industries, without any evidence that those measures are necessary or appropriate.

- 20 In relation to any additional capacity that becomes available after CBH indicates that capacity has been reached for a particular shipping slot at a particular port, please advise if any employees of CBH Grain become aware of available additional capacity prior to notification to industry more broadly**

If an access seeker requires additional capacity they may contact CBH at any time to request additional capacity. If CBH has that capacity available then CBH will provide that capacity on a first come, first serve basis.

CBH places details on port capacity that relies on surge transport resources on its website. Customers understand that with a very small harvest year CBH intended not to provide surge transport resources unless absolutely necessary.

Customers are aware that they need to speak to CBH about surge transport resources. We attach at Annexure A certain emails which demonstrate the publication of port capacity changes.

CBH has also advised customers when the surge transport resources have been activated.

- 21 Please provide details of:**

- (a) any additional types of information that is published or provided to third parties without restriction, in relation to the quantity or quality of stock held by CBH either at port or up-country and any other stock information. Please include details as to how often this information is updated, and the degree this information is aggregated.**
- (b) any additional types of stock information that is available on a limited basis, such as via CBH's website or provided to clients of CBH on request**

Other than information provided as part of the shipping stem or pursuant to the 2009 undertaking and notification of any spare capacity, CBH does not provide information to any person without restriction.

**[Confidential]**

**Request for Information - CBH Access Undertaking for Port  
Terminal Services**

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- 22 Please advise whether employees of CBH Grain are able to access stock information such as grade and quantities, provided to CBH in its role as port terminal operator**

The stock information that employees of CBH Grain are able to access is:

- (i) information relating to CBH Grain's stock; and
- (ii) information relating to stock which is part of the information set out in the shipping stem or provided pursuant to the provisions of the 2009 undertaking. This information is provided generally to all members of the public.

- 23 In view of no customers electing to transport bulk wheat direct to port (i.e. electing not to use CBH's up-country supply chain) in the 2009/10 or 2010/11 years, please identify what barriers there are, if any, to customers transporting bulk wheat direct to port**

CBH is not aware of any barriers to customers transporting bulk wheat direct to port. CBH has an open access port which does not discriminate against a customer making its own arrangements to transport bulk wheat to port. In CBH's opinion, the reason why no customers elected to transport bulk wheat direct to port was due to CBH's efficient and cost effective supply chain solutions.

18 May 2011

Australian Competition & Consumer Commission

**Request for Information - CBH Access Undertaking for Port  
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**Annexure A**  
**Publication of Port Capacity Changes (Question 20)**

## Matthew Knox

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**From:** Smallman, Michelle [Michelle.Smallman@cbh.com.au]  
**Sent:** Tuesday, 1 March 2011 4:28 PM  
**To:** CustomerSupport  
**Subject:** 2010/11 Port Capacity  
**Attachments:** Shipping Stem 1 March 2011.pdf

Dear Customer,

In response to Customer shipping demands for this season, CBH will offer Surge Capacity on request in the Albany and Esperance port zones for April and May shipping windows. In addition, we have reviewed our estimated Capacity in the Kwinana port zone and have amended the shipping stem accordingly (as attached).

The cost of surge will be:

Albany - \$5.70 per tonne  
Esperance - \$3.70 per tonne

We will require a written Surge Capacity request to [customersupport@cbh.com.au](mailto:customersupport@cbh.com.au) no later than four weeks prior to the beginning of the requested shipping window. Requests will be assessed on a first come, first served basis.

Please contact me should you require any further information.

Kind regards,

Michelle

**Michelle Smallman**  
Logistics Customer Service Manager  
CBH Group  
30 Delhi Street, West Perth WA 6005  
M: 0457 099 743  
P: (08) 9237 9776  
F: (08) 9237 9827  
E: [Michelle.Smallman@cbh.com.au](mailto:Michelle.Smallman@cbh.com.au)



## Matthew Knox

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**From:** Smallman, Michelle [Michelle.Smallman@cbh.com.au]  
**Sent:** Friday, 4 March 2011 10:31 AM  
**To:** CustomerSupport  
**Subject:** 2010/11 Port Capacity Update

Dear Customer,

Further to my email on Tuesday 1 March, CBH will now offer Surge Capacity on request in the Albany and Esperance port zones for **April, May and June** shipping windows.

The cost of Surge remains at:

Albany - \$5.70 per tonne  
Esperance - \$3.70 per tonne

We will require a written Surge Capacity request to [customersupport@cbh.com.au](mailto:customersupport@cbh.com.au) no later than four weeks prior to the beginning of the requested shipping window. Requests will be assessed on a first come, first served basis.

Please contact me should you require any further information.

Kind regards,

Michelle

**Michelle Smallman**  
Logistics Customer Service Manager  
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30 Delhi Street, West Perth WA 6005  
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F: (08) 9237 9827  
E: [Michelle.Smallman@cbh.com.au](mailto:Michelle.Smallman@cbh.com.au)





**Matthew Knox**

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**From:** Smallman, Michelle [Michelle.Smallman@cbh.com.au]  
**Sent:** Wednesday, 6 April 2011 4:17 PM  
**To:** CustomerSupport  
**Subject:** 2010/11 Port Capacity update

Dear Customer,

Further to my recent emails regarding Surge Capacity for the Albany and Esperance port zones, please note that as all Surge Capacity has now been subscribed to (with the exception of the Shipping windows in Esperance for May), all future requests will now be considered on a case by case basis.

Surge Capacity Requests will only be considered in instances where a Spare Capacity Booking Form has been submitted to [customersupport@cbh.com.au](mailto:customersupport@cbh.com.au).

Kind regards,

Michelle

**Michelle Smallman**  
Logistics Customer Service Manager  
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