

# SUBMISSION

Fisherman Islands (Brisbane): Exemption from Port Terminal Access (Bulk Wheat) Regulation

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# 1. BACKGROUND

GrainCorp Operations Ltd (**GrainCorp**) makes this submission to the Australian Competition and Consumer Commission (**ACCC**) in support of its application for an exemption for GrainCorp's Fisherman Islands (Brisbane) Port Terminal Facility (**Brisbane Port Terminal**) under the new Port Terminal Access (Bulk Wheat) Regulation 2014 (**the Code**).

GrainCorp is proud of its track record as a provider of port elevation services to bulk grain exporters wishing to access its port infrastructure, before and after access regulation was introduced in 2009.

GrainCorp is vertically integrated as a port service provider and an exporter of grain in Queensland. However GrainCorp has no market power, and is commercially incentivised to maximise grain throughput at its Port Terminals, given:

- Strong competition from competing domestic and container packing markets,
- Competition in the provision of port elevation services for bulk grain export from the unregulated Wilmar Gavilon's Queensland Bulk Terminals (**QBT**) at Brisbane.
- Excess country and packing capacity combined with excess port elevation capacity.

Granting an exemption for GrainCorp's Brisbane Port Terminal will:

- Place GrainCorp on a level playing field with competing alternative markets (domestic and container packing), neither of which are subject to regulation.
- Place GrainCorp on a level playing field with the competing bulk grain port terminal, QBT, which has not been subject to regulation.
- Promote grain industry competition by allowing GrainCorp to provide competitive services to exporters for bulk grain exports.
- Support investment and lower supply chain costs by allowing GrainCorp to operate its Port Terminals and supporting supply chain more flexibly.

# 2. COMPETITION CONSIDERATIONS

This section summarises the matters the ACCC must have regard to under Subclause 5(3) of the Code.

## ***The legitimate business interest of GrainCorp as a port terminal service provider***

GrainCorp's Brisbane Port Terminal faces:

- Variable grain production and variable bulk export task that ranges from 0.1-1.6Mt;
- Strong demand from domestic end-users for 50% of production, limiting grain for export;
- Strong demand from container packers for 35% of exports, limiting bulk export grain;
- Increasing competition from QBT for 25% of bulk exports; and
- Strong competition and excess capacity at each step of the grain supply chain.

Granting an exemption to GrainCorp's Brisbane Port Terminal would:

- Allow GrainCorp to compete commercially for the export of bulk grain;
- Support operational flexibility to improve service and reduce supply chain costs;
- Provide equity with competing export container packers that are not regulated;
- Provide equity with a competing bulk port terminal, QBT, that is not regulated; and
- Reduce the level of regulation and cost of compliance.

### ***The interests of exporters who may require access to port terminal services***

GrainCorp has exported an annual average of 0.7 million tonnes of bulk grain from its Brisbane Port Terminal over the past 10 years. Based on exports for the past 5 years (following the removal of the single desk) the largest five exporters represent around 85% of total exports. These exporters are:

- GrainCorp Marketing (30%)
- Cargill (21%)
- Glencore (13%)
- Agrex (13%) and
- Pentag (8%).

### ***The likelihood that exporters of bulk wheat will have fair and transparent access to port terminal services; the promotion of the economically efficient operation and use of the port terminal facility; promotion of efficient investment in port terminal facilities.***

GrainCorp has a commercial imperative to provide fair access to its Brisbane Port Terminal for all exporters, given:

1. Significant excess capacity: Brisbane has 2.7Mt of annual bulk export elevation capacity for an average bulk grain export task of 0.7Mt. Average utilisation is only 25%.
2. Alternative markets: Bulk grain export competes with the competitive domestic and containerised grain export markets. These alternative markets manage most (around 65%) of Southern Queensland's average grain production.

### ***The promotion of competition in upstream and downstream markets***

Competition and excess capacity along the whole supply chain, combined with low barriers of entry, limits any potential market power of GrainCorp port (and country) facilities:

- Country storage: There is 5.6Mt of storage capacity to service an average production of 2.2Mt with an average utilisation of 40%.
- Numerous marketing options: Growers have a range of marketing options for their grain including the domestic feedlots and container packers. These markets have a combined capacity of 2.4Mt with the ability to handle average production.

All GrainCorp's major export customers are large multinational traders that are many times larger than GrainCorp with access to significant capital and overseas grain markets. They have demonstrated their financial ability, despite excess port capacity, to build and invest in new port terminals such as QBT in Brisbane and terminals at other ports. This demonstrates that the barriers to entry for new port terminal elevation capacity are low.

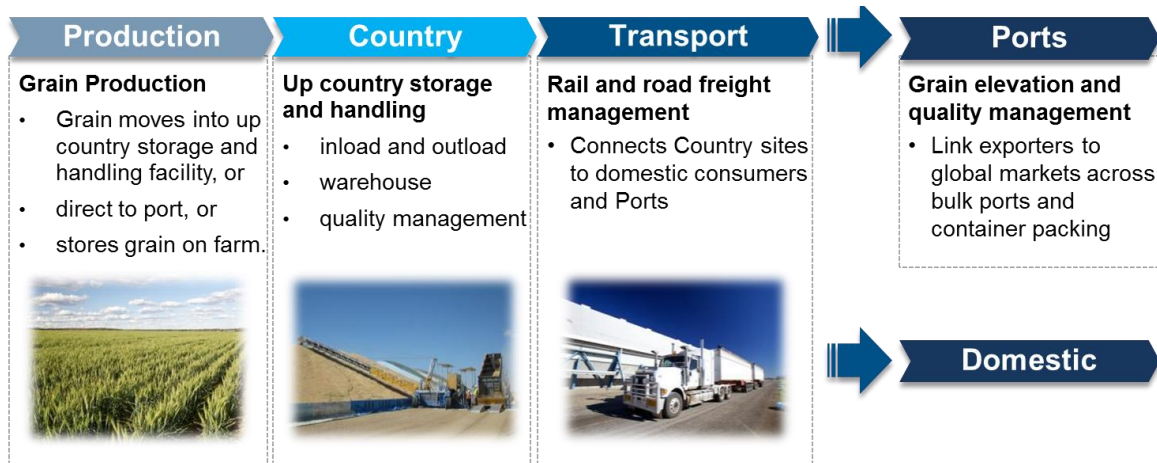
### ***Whether there is already an exempt service provided within the grain catchment area***

The QBT Port Terminal has been operational for three years and has not been subject to regulation. This has given this port terminal an unfair advantage to negotiate flexible terms and to offer flexible services for exporters.

# 3. SOUTHERN QUEENSLAND GRAIN MARKET

## 3.1 BRISBANE PORT ZONE

The grain supply chain comprises the following aspects:

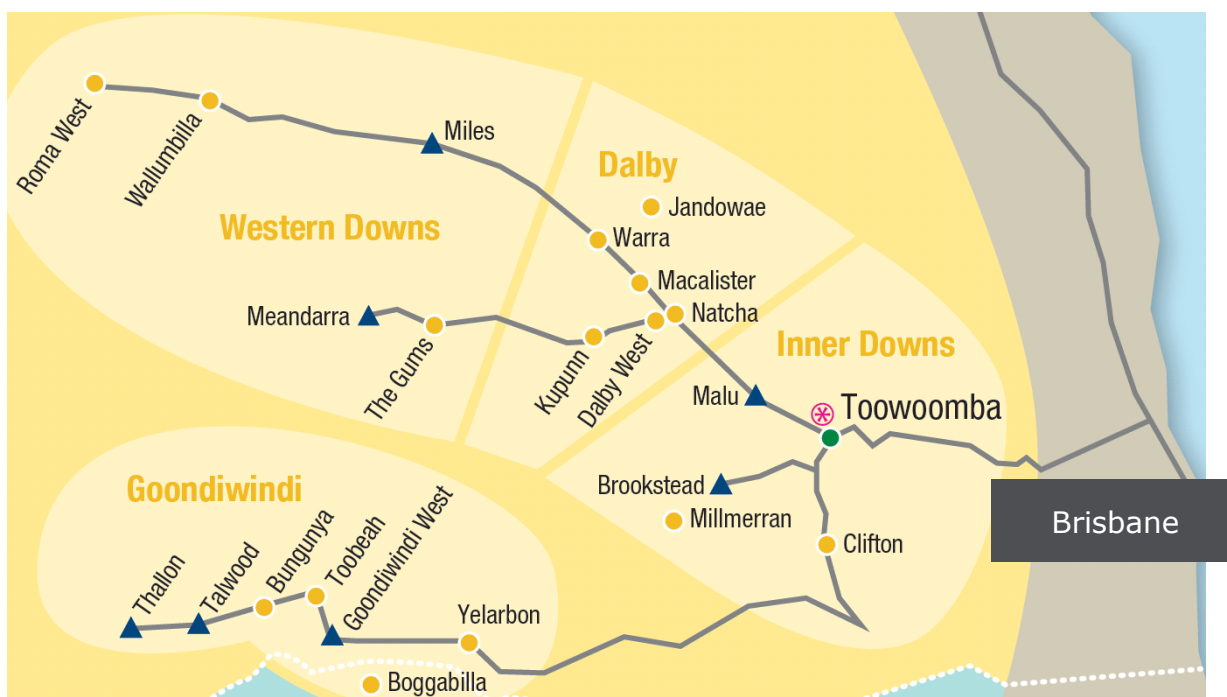


As shown in Figure 1, the Brisbane Port Zone services Southern Queensland from the Darling Downs to Meandarra and Miles to the north west and Goondiwindi and Thallon to the west, where:

- Brisbane Port services both bulk and container export grain.
- The two major crops grown are wheat (harvested from October to November) and sorghum (harvested from April to June).
- Rail plays a role in moving bulk export grain for longer hauls, of 400 to 650km, to Brisbane. However most grain grown closer to Brisbane moves by road.

Growers in Southern Queensland enjoy a range of substitutable demand alternatives, including large domestic and container packer markets. Depending on production and grain quality, grain from Northern NSW and Central Queensland regularly flows into Southern Queensland to service its large inland domestic market.

**Figure 1. Brisbane Port Zone – Southern Queensland**





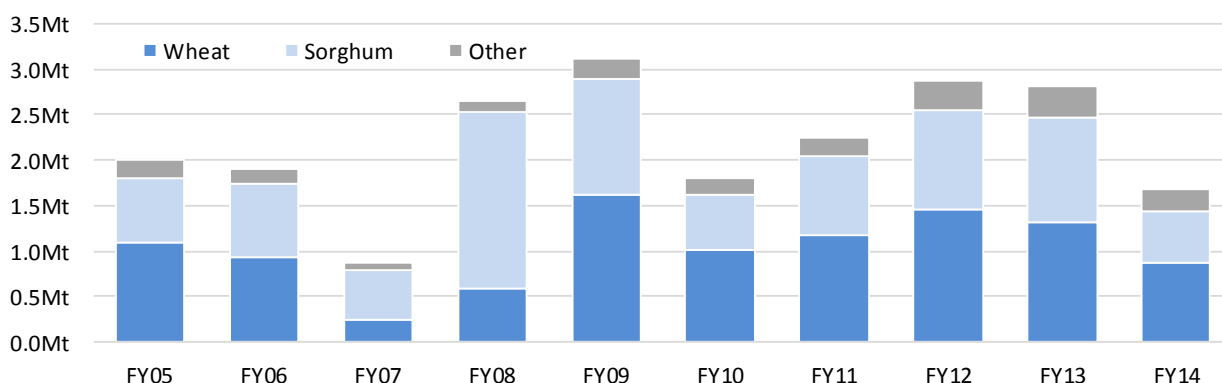
### 3.2 PRODUCTION

Southern Queensland produces on average 2.2Mt of grain per annum. Figure 2 shows grain production is variable and has ranged from 0.9Mt to 3.1Mt over the last 10 years. 90% of grain produced in Southern Queensland is wheat and sorghum.

**Figure 2. Commodity Metrics – Grain Production in Southern Queensland**

Million tonnes

Customer	FY05	FY06	FY07	FY08	FY09	FY10	FY11	FY12	FY13	FY14	10 Yr Avg	Share
Wheat	1.08	0.92	0.24	0.59	1.61	1.02	1.18	1.45	1.31	0.87	1.0	47%
Sorghum	0.73	0.81	0.56	1.94	1.28	0.60	0.87	1.10	1.16	0.57	1.0	44%
Barley	0.15	0.13	0.05	0.11	0.14	0.09	0.12	0.16	0.17	0.13	0.1	6%
Other	0.03	0.03	0.03	0.01	0.09	0.09	0.09	0.15	0.17	0.13	0.1	4%
<b>Total</b>	<b>2.00</b>	<b>1.90</b>	<b>0.88</b>	<b>2.64</b>	<b>3.12</b>	<b>1.80</b>	<b>2.25</b>	<b>2.87</b>	<b>2.81</b>	<b>1.69</b>	<b>2.2</b>	<b>100%</b>



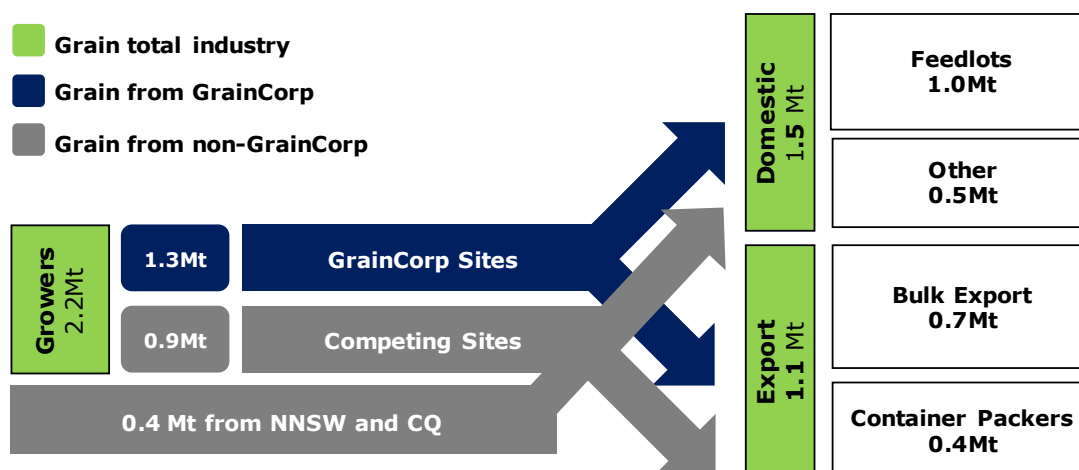
### 3.3 DIVERSE MARKETS FOR GRAIN

Growers in Queensland, as with growers in NSW and Victoria, have ready access to a large number of marketing channels and buyers for their grain. Queensland grain growers are less dependent on bulk grain exports than other parts of Australia.

The movement of grain from Southern Queensland is shaped by the interplay of the export and domestic markets, which changes from year to year. Grain from Southern Queensland can move east into the Brisbane export and domestic markets (by road or rail) but also can move into the significant domestic and container packing markets. The large demand from the domestic market also draws grain from northern NSW and has substantially limited the surplus of grain available for export.

Figure 3 shows the Southern Queensland grain flow based on average production of 2.2Mt. In an average year it is estimated that around 0.4Mt of grain is moved from northern NSW and Central Queensland into Southern Queensland to service the inland domestic market.

**Figure 3. Southern Queensland Normalised Grain Supply and Demand**



# 4. BULK GRAIN PORT TERMINALS

Figure 4. Comparison of Brisbane port terminals

Capability	GrainCorp Fisherman Islands	Wilmar Gavilon QBT
<b>Rail receipt</b>	up to 2,200 TPH	No rail
<b>Road receipt</b>	up to 400 TPH	Not disclosed
<b>Ship loading</b>	up to 2,200 TPH	up to 1,000 TPH
<b>Berth draft</b>	Berth Length 285m Berth Depth 13m	Berth Length 160m QBT draft - 9.9m LAT
<b>Vessel capacity</b>	70,000 DWT	35,000 DWT (estimated)
<b>Storage capacity</b>	Vertical Storage 62,700 tonnes Horizontal sheds 30,000 tonnes Bunker storage 20,000 tonnes	Bulk grain storage 85,000 tonnes Liquid storage 10,000 tonnes
<b>Shipping capacity</b>	2,000,000 tonnes per annum	700,000 tonnes per annum



## 4.1 GRAINCORP FISHERMAN ISLANDS

The GrainCorp Fisherman Islands Port Terminal is located at the Port of Brisbane. The terminal handles the shipment of wheat, barley, sorghum, legumes and non-grain commodities. The facility has rail and road intake, grain storage and weighing facilities and one ship loader.

The Fisherman Islands facility was built to replace the old Pinkenba Port Terminal. Construction of the 62,700 tonnes of vertical storage was completed in 1986. In 1999 a multipurpose shed of 30,000 tonnes capacity, capable of storing grain, sugar and cottonseed, was built.

The Fisherman Islands Port Terminal has an annual elevation capacity of 2 million tonnes and an ability to service vessels up to 70,000 DWT. Grain is received by rail at a rate of up to 2,200 tonnes per hour and road at a rate of up to 400 tonnes per hour. The facility has one ship loader which can load at a rate of up to 2,200 tonnes per hour.

The Brisbane facility is managed by GrainCorp. The wharf is owned by the Port of Brisbane and is available to other users on an as needs basis. The wharf is regularly used by cruise liners which disrupts access for grain exports.

Within the Brisbane Port Zone, GrainCorp has 22 country silos and manages both rail and road transport to the Fisherman Islands Port Terminal.

Fisherman Islands has a container packing facility with the ability to pack 200Kt per annum.

GrainCorp also has an old grain port terminal at Pinkenba. This terminal is only used for the import and export of non-grain commodities such as sugar, meal and fertiliser. This terminal also stores barley for GrainCorp's Pinkenba malt house.

Bulk grain exports from Fisherman Islands, given the large domestic and container packing demand, is variable ranging from 0.1Mt to 1.6Mt. Fisherman Islands services over 10 exporters where the largest five, with 85% of exports, are GrainCorp (30%), Cargill (21%), Glencore (13%), Agrex (13%) and Pentag (8%). The other exporters serviced are CBH, Riverina, ADM, Emerald and Touton.

Figure 5 provides an overview of Fisherman Islands' bulk export by commodity and Appendix 1 provides an overview of exporters for the past 10 years.

### Figure 5. Bulk export grain volumes – GrainCorp Fisherman Islands Exports

#### Commodity Metrics - GrainCorp Fisherman Islands Terminal Exports

Million tonnes

Customer	FY05	FY06	FY07	FY08	FY09	FY10	FY11	FY12	FY13	FY14	10 Yr Avg	Share
Wheat	0.62	0.47	0.09	0.03	0.82	0.54	0.68	0.76	0.50	0.08	0.46	69%
Sorghum	0.04	0.02	-	0.29	0.75	-	0.16	0.39	0.21	-	0.19	28%
Barley	-	-	-	-	-	-	-	0.01	-	-	0.00	0%
Other	-	-	-	0.01	-	-	0.02	0.06	0.11	0.01	0.02	3%
<b>Grand Total</b>	<b>0.66</b>	<b>0.48</b>	<b>0.09</b>	<b>0.34</b>	<b>1.57</b>	<b>0.54</b>	<b>0.86</b>	<b>1.22</b>	<b>0.82</b>	<b>0.09</b>	<b>0.67</b>	<b>100%</b>

## 4.2 QUEENSLAND BULK TERMINALS (QBT)

QBT is located on the southern bank of the Brisbane River, accessible from the Gateway Motorway. QBT is wholly owned subsidiary of Wilmar Gavilon, which is part of a vertically integrated supply chain with approximately 1.8 million tonnes of commodities traded or handled annually.<sup>1</sup>

The QBT facility has 85,000 tonnes of bulk grain storage, 10,000 metric tons of bulk liquid storage, two all-weather grain receiving stations, a container packing facility and a ship loader.<sup>2</sup> QBT handles all bulk grains and pulses, including wheat, sorghum, maize and chickpeas.

<sup>1</sup> Queensland Bulk Terminals. Available at: <http://www.qldbultterminals.com/storage.html>

<sup>2</sup> Queensland Bulk Terminals. Available at: <http://www.qldbultterminals.com/storage.html>



QBT has a storage shed with 80,000 tonnes of capacity.<sup>3</sup> According to the QBT website, it has a capacity to ship 700,000 tonnes of bulk grain each year at an average rate of 1,000 TPH, with 24 hour operation during shipping. QBT's annual export capacity, including liquids, is 800,000 tonnes.<sup>4</sup>

QBT has aligned itself with country storages (eg GrainHart) for the rapid rotation of road trucks to access competitive road transport rates.

Based on ACF information, QBT has exported up to 0.47Mt of bulk grain in a season comprising 50% wheat and 50% sorghum. QBT services 8 exporters where the largest 3 (with 80% of exports) are Gavilon, Emerald and Cargill.

QBT's shiploader during 2014 become non-operational. Its shiploader was repaired and become operational in April 2015. The terminal is expected to load around 100Kt of bulk export grain in 2015.

QBT has the capacity to pack 1,000 tonnes of containerised grain per day (around 40 boxes). The container packing facility has eight silos, each of 650 metric ton capacity with fumigation capacity.<sup>5</sup>

**Figure 6. QBT Facility<sup>6</sup>**



<sup>3</sup> Queensland Bulk Terminals. Available at: <http://www.qldbultterminals.com/storage.html>  
<sup>4</sup> Queensland Bulk Terminals. Available at: <http://www.qldbultterminals.com/shipping.html>  
<sup>5</sup> Queensland Bulk Terminals. Available at: <http://www.qldbultterminals.com/shipping.html>  
<sup>6</sup> QBT website. Available at: <http://www.qldbultterminals.com/sitemap.html>

## 5. COMPETITION ANALYSIS

The Southern Queensland grain industry is a diverse and competitive grain market. Figure 7 below outlines the key indicators for the Queensland grain industry over the past 10 years, with 3 and 10 year averages to demonstrate through-the-cycle averages.

The following metrics demonstrate the diversity of the Queensland grain market:

- The large domestic market consumes an average of 1.1Mt representing 45% of grain production in an average year. This does not include an estimated 0.4Mt of grain that moves in from northern NSW and Central Queensland.
- The container export market ships 0.4-0.5Mt, on the back of low cost container rates, and low barriers to entry. This represents 20% of grain production and 35% of grain exports.
- The bulk export market handles ships 0.7Mt of surplus grain that is not consumed by the domestic and export container markets. This represents 35% of grain production.
- QBT entered into the market in 2012 and has shipped up to 0.5Mt.

**Figure 7. Grain Market and Competition Metrics – Southern Queensland**

Million tonnes

	FY05	FY06	FY07	FY08	FY09	FY10	FY11	FY12	FY13	FY14	10 Yr Avg	3 Yr Avg
<b>Grain Production</b>	2.0	1.9	0.9	2.6	3.1	1.8	2.2	2.9	2.8	1.7	2.2	2.5
GNC Receivals											1.3	1.3
<i>GNC Country Share</i>											58%	54%
GNC Bulk Exports											0.7	0.7
QBT Bulk Exports (1)											0.1	0.2
Containers (2)											0.4	0.5
<b>Grain Exports</b>											1.1	1.3
<i>Container share</i>											33%	34%
<i>GNC Export Share</i>											61%	54%
<i>GNC Bulk Export Share</i>											91%	76%
<b>Estimated Domestic (2)</b>											1.1	1.1
<i>Domestic Share</i>											50%	43%

(1) Based on ACF data. No data for QBT in FY14 (impacted by shiploader under repairs)

(2) Based on ACF data

(2) Difference between production & exports and excludes movements from NNSW. Varies due to changes in carry in and carry out

### 5.1 EXCESS BULK GRAIN EXPORT CAPACITY

Southern Queensland is serviced by two bulk grain facilities and consequently has significant excess bulk export grain capacity. It has an estimated combined bulk elevation capacity of 2.7Mt per annum:

- 2Mt at GrainCorp's Fisherman Islands Port Terminal that has handled a peak task of 1.6Mt.
- 0.7Mt at Queensland Bulk Terminals that has handled a peak task of 0.5Mt.

As shown in Figure 8, average utilisation of bulk grain elevation is only 25% based on an average bulk export task of 0.7Mt or 58% based on a peak bulk export task of 1.6Mt.

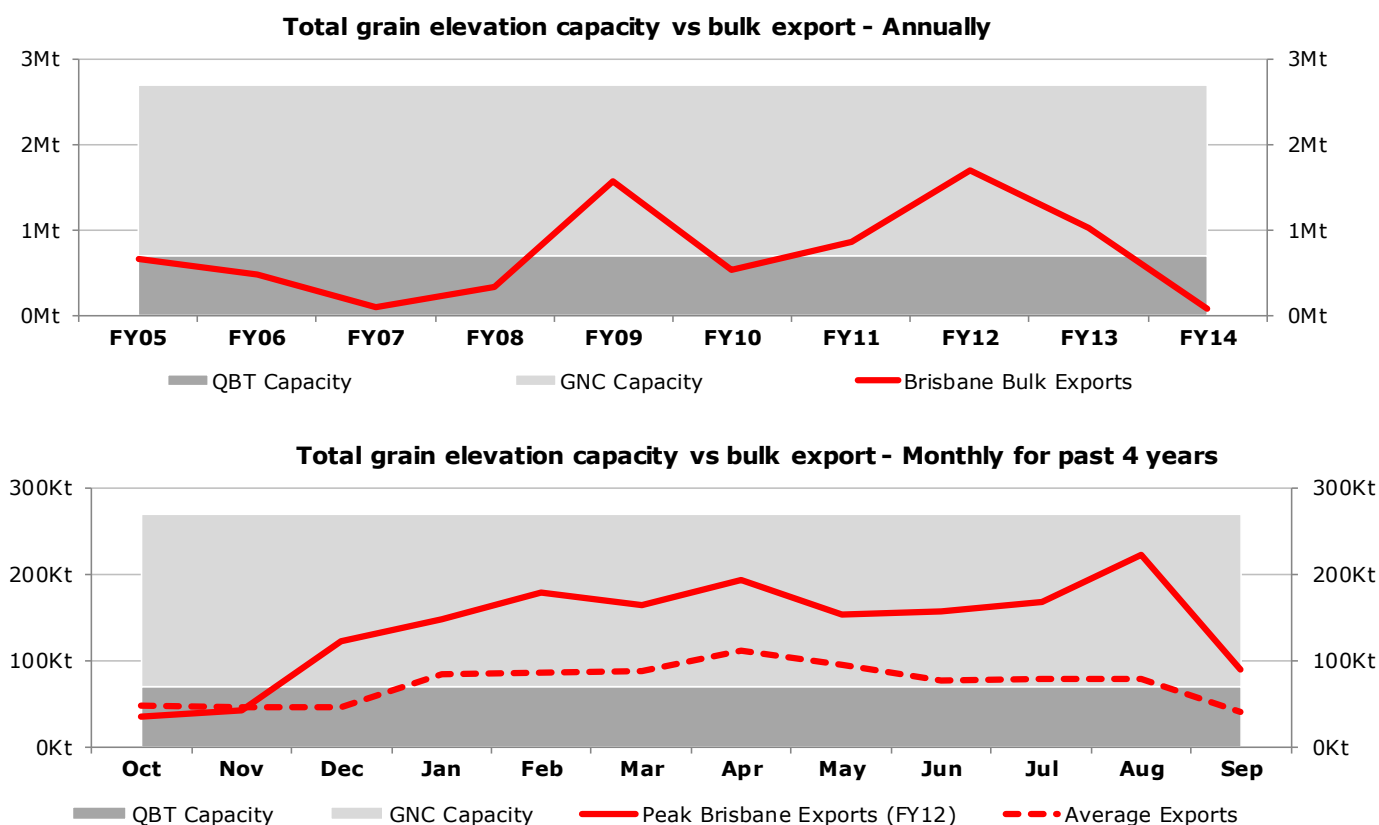
**Figure 8. Estimated Total Bulk Export Capacity in Southern Queensland**

Port Terminal	Capacity	Portion	Avg Export / Capacity	Peak Export / Capacity
GNC Fisherman Islands	2,000,000	74%		
QBT Brisbane	700,000	26%		
<b>Total Capacity</b>	<b>2,700,000</b>	<b>100%</b>	<b>25%</b>	<b>58%</b>
<b>Bulk Exports</b>			<b>671,161</b>	<b>1,574,502</b>

The Brisbane Port Zone has excess bulk export grain capacity in terms of both annual and average monthly throughput, resulting in low levels of utilisation in an average production year. Figure 9 below show that, based on an average export task of 0.7Mt:

- Port terminal utilisation is very low, with port storage capacity turning over only 5 times a year. This compares to 26-52 turns at port terminals in North America.
- Annual utilisation of capacity averages 25% (ranging from 5%-60%). QBT with its annual capacity of 700Kt, could handle 100% of the average 700Kt export task. In six of the past 10 years, the competing QBT port terminal had capacity to handle the variable export task.
- Average monthly utilisation averages 25% (ranging from 15%-45%). QBT with its monthly capacity of 70Kt, could handle 100% of the average 700Kt export task. In 5 of the 12 average months the competing QBT had capacity to handle the variable export task.

**Figure 9. Brisbane grain elevation capacity vs. bulk exports – Annually and Monthly**



## 5.2 COMPARISON OF CAPABILITY

GrainCorp Fisherman Islands Port Terminal, unlike QBT, has the ability to receive grain by rail transport and to load vessels with more than 35,000 tonnes. However, as explained below, this capability does not deliver Fisherman Islands a significant advantage over QBT.

### Rail transport

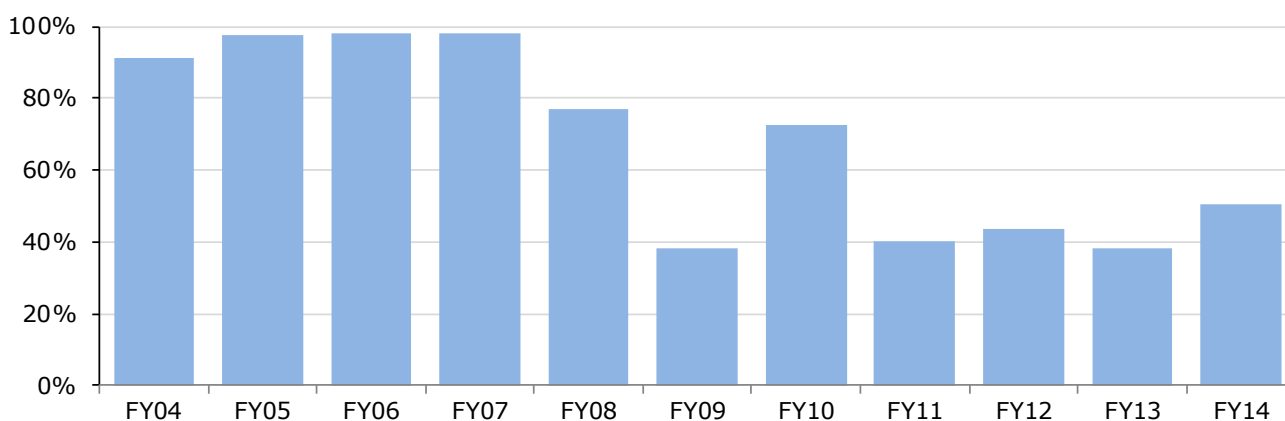
Road dominates the movement of grain from Southern Queensland. All domestic and most containerised grain is moved by road. The cost of road is comparable to rail transport and can be lower if grain is sourced direct from ex-farm into Brisbane.

Aurizon is the sole rail provider for grain in Southern Queensland where GrainCorp only contracts 2 trains for export grain, compared to over 5 trains supplied in the past. GrainCorp uses this rail transport for its grain and also sub-contracts this rail transport to other exporters.

The portion of export grain moved by rail into Fisherman Islands in the past 10 years has declined from 100% to around 40%, as shown in Figure 10 below. This large shift from rail to road is due to:

- The high fixed 'take or pay' cost for rail makes contracting rail expensive. In low export years, such as this year, GrainCorp makes a 'loss' as it cannot recoup this fixed cost.
- The variable rail cost has increased more than road transport, given reduced Government support for rail transport and low wagon productivity with lack of investment in track and wagons. The maximum payload for rail wagons in Queensland is only 46.5 tonnes (compared to 55 tonnes in other states) which is comparable to the payload for the new larger road trucks.
- The growth of demand for coal transport has limited rail capacity for grain and increased the cost of contracting rail paths down the Toowoomba range.
- The move to B-Double and A-Triple road trucks has reduced the cost of road transport.

**Figure 10. Share of rail for bulk export grain into Fisherman Islands**



### Loading larger vessels

Most vessels loaded from Brisbane are small vessels or are partly-loaded vessels that are loaded across two ports (either at another port in Queensland or in another state). As shown in Figure 11, 95% of vessels (and 90% of tonnage) loaded from Fisherman Islands are less than 35,000 tonnes (the maximum load from QBT).

**Figure 11. Distribution of vessel loads from Fisherman Islands**

	<15 KT	<20 KT	<25 KT	<30 KT	<35 KT	> 35 KT
<b>Tonnes</b>	10%	23%	44%	76%	90%	8%
<b>Ships</b>	18%	36%	57%	84%	94%	5%

### 5.3 COMPETING EXPORT CONTAINER PACKERS

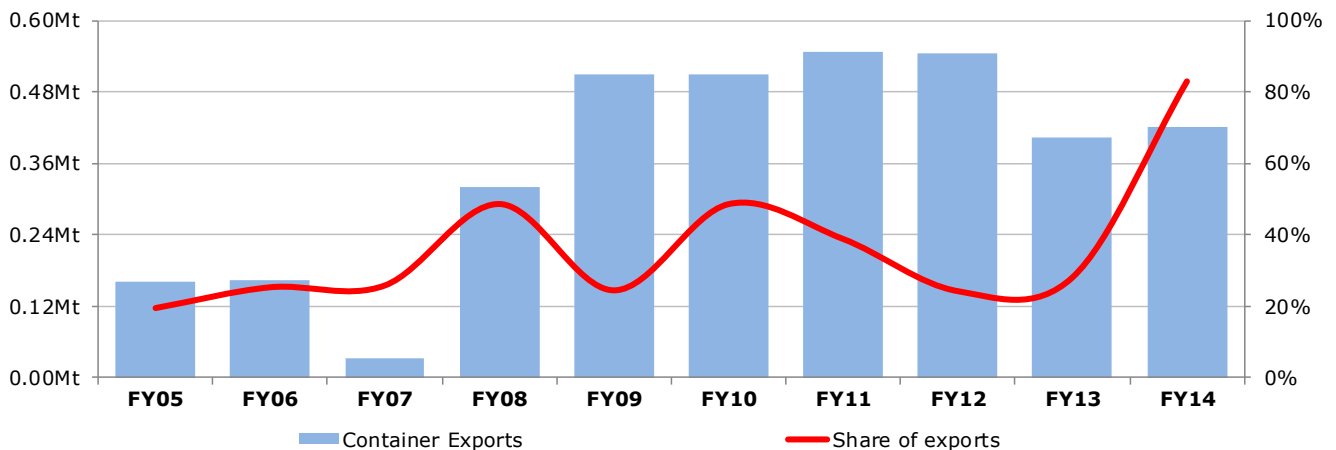
The non-regulated export container market is a major competitor for bulk wheat and other grains across eastern Australia. In Southern Queensland, GrainCorp faces competition from 11 major container packers with an estimated total packing capacity of around 1.2Mt. This includes packers owned by Mount Tyson Seeds, GrainHart, Woods Grain, A&B Grain and Broadbent. Details of packers are in Appendix 2.

As shown in Figure 12 below, the export of grain in containers has expanded fourfold over the last 10 years. The current average annual volume of 0.5Mt, represents 35% of total exports from southern Queensland. Containerised grain is more resilient than bulk grain as evidenced by more stable supply.

The strong growth in container exports has been driven by:

- Deregulation in 2004, which allowed this industry to grow substantially prior to removal of the single wheat desk for bulk exports in 2008.
- Demand from processors in China and south-east Asia who prefer smaller parcels of grain.
- Favourable supply-side drivers including the availability of empty containers in eastern Australia, low container shipping rates compared to bulk shipping rates, and relatively low barriers to entry for container packers to enter the market.

**Figure 12. Queensland containerised wheat exports (based on ACF data)**



### 5.4 EXCESS COUNTRY STORAGE CAPACITY

The large range of marketing options in Southern Queensland has supported a substantial and competitive country storage options that include GrainCorp and independent country silos, on farm storage combined with domestic consumption and container packing capacity.

This has led to significant excess country storage capacity as outlined in Figure 13. GrainCorp estimates that Southern Queensland has total storage capacity of 5.5Mt with average utilisation of only 40%, falling to 28% if country domestic and container packing capacity is included.

**Figure 13. Total Country Capacity in Southern Queensland and Utilisation**

Country Storage	Sites	Capacity	Portion	Avg Prod / Capacity	Peak Prod / Capacity
GrainCorp	22	2,350,360	30%		
Other bulk handlers	13	1,300,000	17%		
On-farm (ABS estimate)		1,832,953	23%		
<b>Total</b>	<b>35</b>	<b>5,483,313</b>	<b>70%</b>	<b>40%</b>	<b>57%</b>
<b>Production</b>				<b>2,190,558</b>	<b>3,119,851</b>
County Domestic	13	1,180,291	15%		
Country Packers	12	1,205,000	15%		
<b>Total</b>	<b>13</b>	<b>2,385,291</b>	<b>30%</b>		
<b>Combined Total</b>	<b>48</b>	<b>7,868,604</b>	<b>100%</b>	<b>28%</b>	<b>40%</b>
<b>Production</b>				<b>2,190,558</b>	<b>3,119,851</b>

GrainCorp operates 22 country silos in Southern Queensland with a total capacity of 2.3Mt. These silos receive on average 1.3Mt of grain, representing an average market share of 55% against average grain production of 2.2Mt.

The volume of grain bypassing GrainCorp country silos ranges from 0.6-1.3Mt, demonstrating the capability and capacity of alternative supply chains.

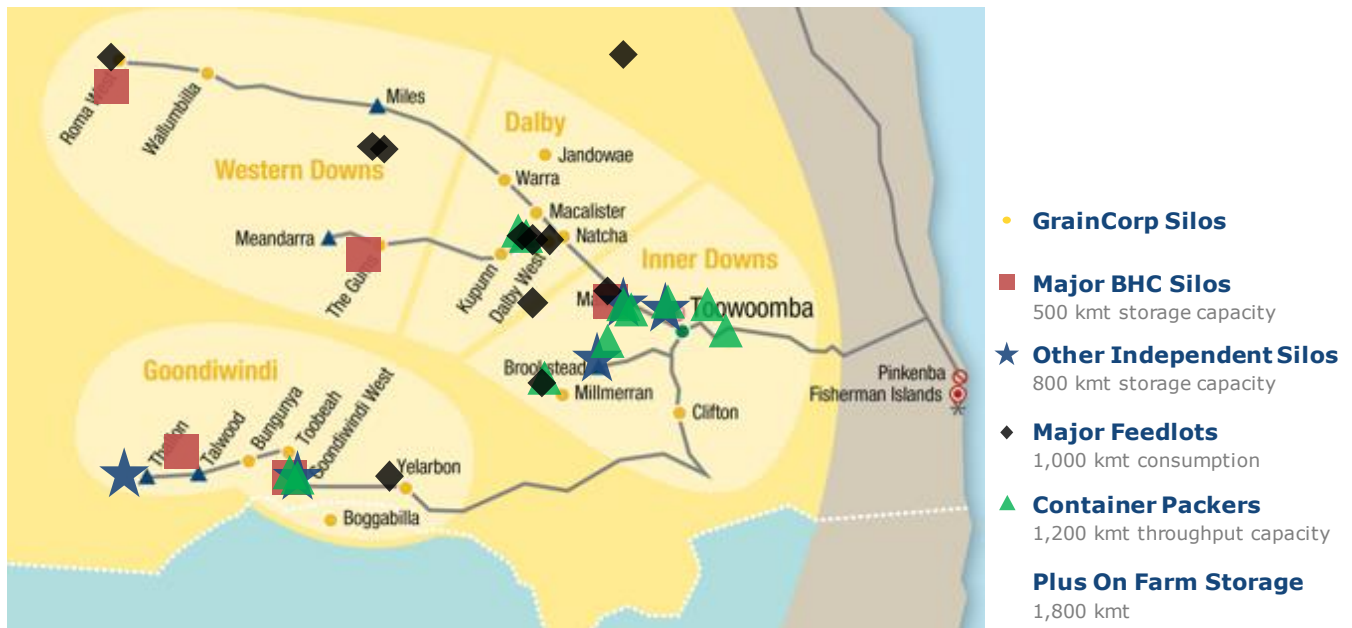
GrainCorp faces competition from around 13 major competing country silos in Southern Queensland. These country silos are owned by competitors including major grain exporters Cargill, as well as Associated Grain, Woods and Thallon Grains. These competing country silos have an estimated capacity of around 1.3Mt, and many have access to container packing capability.

GrainCorp also faces significant competition from on-farm storage. Growers in Queensland have access to large on-farm storage capacity, supplemented by silo bags. It is estimated that Southern Queensland has around 1.8Mt of on-farm storage.

Figure 14 shows the level of dispersed and significant competition between GrainCorp and competing country silos along with feedlots and container packers. Appendix 2 includes a list of storage locations and ownership.



**Figure 14. Competitive Country Landscape in Southern Queensland**



## 6. CONTACT INFORMATION

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# APPENDIX 1: FISHERMAN ISLAND CUSTOMERS

## Customer Metrics - GrainCorp Fisherman Islands Terminal Exports

Million tonnes

Customer	FY05	FY06	FY07	FY08	FY09	FY10	FY11	FY12	FY13	FY14	5 Yr Avg	Share
<b>Total</b>	<b>0.66</b>	<b>0.48</b>	<b>0.09</b>	<b>0.34</b>	<b>1.57</b>	<b>0.54</b>	<b>0.86</b>	<b>1.20</b>	<b>0.82</b>	<b>0.09</b>	<b>0.70</b>	<b>100%</b>

## APPENDIX 2: COMPETING COUNTRY FACILITIES

Country Silos	Site	Capacity
<b>Total</b>		<b>1,300,000</b>

Country Domestic	Site	Area	Consumption
<b>Total</b>			<b>1,180,291</b>

Country Packers	Location	Capacity
<b>Total</b>		<b>1,205,000</b>