



ADM Trading Australia Pty Ltd

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August 7, 2015

RE: Response to ACCC draft decision paper – Viterra LTAs

SUBMISSION: ADM Trading Australia Pty Ltd

To Whom It May Concern

ADM Trading Australia Pty Ltd (ADM) is disappointed that South Australian export capacity has reverted to Auctions for the 2015/2016 season.

Whilst we had concerns with aspects of Viterra's Long Term Agreement (LTA) proposals, which were covered in the ACCC's draft decision, our clear preference was to avoid Auctions for the coming season as they have proven to be an ineffective, labour-intensive and cost-prohibitive mechanism for allocating export capacity.

ADM are concerned with the 18 month time lapse between the communication of the original LTA concept and the ACCC's draft decision as released on the 16th of July 2015. It is unacceptable for the industry to spend 18 months discussing a capacity allocation system that has almost unanimous support, only to revert to status quo less than 3 months from the beginning of the South Australian harvest period.

Assuming the ACCC's draft decision is confirmed and Viterra amend and re-submit their application to vary the Port Loading Protocols for subsequent seasons, ADM would hope that the process to move to Long Term Agreements is finalised in a timely manner to provide exporters with greater clarity.

Regards

A handwritten signature in black ink, appearing to read 'Tim Henry'.

Tim Henry – General Manager

ADM TRADING AUSTRALIA PTY LTD