

06 July 2017

General Manager  
Infrastructure & Transport – Access & Pricing Branch  
ACCC  
GPO Box 520  
MELBOURNE VIC 3001

**Grower-driven advocacy for  
a profitable grains industry**

Email: [transport@acc.gov.au](mailto:transport@acc.gov.au)

Dear Sir/Madam

**Re: Semaphore Container Services Pty Ltd Application for Exemption from Parts 3 to 6 of the Port Terminal Access (Bulk Wheat) Code of Conduct.**

Grain Producers SA (GPSA) is the peak industry body for South Australian grain producers. It is unique in that it is a non-political body that represents all grain producers to government, the community and industry. It is funded via the SA Grain Industry Fund (Primary Industries Funding Scheme) which nearly all grain producers in this state contribute to. GPSA is a founding member of Primary Producers SA.

The State's grain industries are large and diverse, making a significant contribution to the economy. Total grain production in South Australia from an estimated 3,000 grain producing businesses for the 2016/17 season of 11.1 million tonnes is a new record for South Australia. The grains industry is not only a major contributor to this state's economy it is also a significant export earner.

As the peak body for grain producers in this State, GPSA would like to make a submission on Semaphore Container Services Pty Ltd (Semaphore) application for exemption from Parts 3 to 6 of the Port Terminal Access (Bulk Wheat) Code of Conduct.

GPSA supports the draft determination by ACCC that Semaphore should be an exempt service provider of port terminal services at Osborne Berth 1, Inner Harbour, Port Adelaide.

GPSA supports the ACCC's draft view "that exempting Semaphore at Inner Harbour, Port Adelaide is in the public interest and will not be detrimental to competition in markets". GPSA believes that the proposed export of 220,000 metric tonnes per marketing season through the facility is small relative to the amount of grain exported through nearby facilities.

If you have any queries or need any further information, please don't hesitate to contact Mr Darren Arney, Chief Executive Officer, GPSA on 0448 186 707.

Yours sincerely



Wade Dabinett  
Chairman  
Grain Producers SA Ltd