

From: Phil Jobling
Sent: Monday, 15 April 2019 10:01 AM
To: Adjudication
Subject: AA1000438 - Seedwise – submission

Categories: Submission

To the ACCC Adjudications Panel

RE- Seedwise Application for Authorisation

PGG Wrightson Seeds (Australia) trading as GrainSearch is strongly in support of the application by Seedwise to continue to negotiate the terms and conditions under which End Point Royalties (EPR) are collected on our behalf.

- GrainSearch derives a large part of its total income from the collection of EPR's from its five (5) commercial cereal varieties. Without an effective EPR collection process, we would not be able to perform our ongoing evaluation and commercialisation roles – which would serve to lessen competition in the market place and restrict grower (farmer) access to leading cereal genetics from around the globe.
- GrainSearch comprises 1.5 Full Time Equivalent employees and therefore, would not be able to economically perform the tasks that Seedwise performs on our behalf across Australia.
- If GrainSearch were to attempt to perform these tasks, our ability to gain audience with many of the grain accumulation companies would be very poor, as our EPR collections are comparatively small against the large breeding companies such as AGT and Intergrain.
- By representing all EPR companies collectively, Seedwise is able to gain audience and effectively negotiate EPR collection with these companies.
- Seedwise has been instrumental in growing the number of companies willing to collect EPR's from growers, thus increasing our EPR collection rates in areas where farmers have been less than perfect in freely declaring their own production information. This growth in EPR collections from traditional feed grain buyers has given Grainsearch the confidence to increase evaluation of a range of feed wheat and barley material. This is to the ultimate benefit of many feed grain growers.
- GrainSearch believes there is no viable alternative model to negotiate EPR collections available to us, or the industry collectively.

End of submission

Yours Faithfully

Philip Jobling
GrainSearch Business Manager

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