



**Australian
Competition &
Consumer
Commission**

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Our Ref: N91712-5
Your Ref: SAB:101629/213
Contact Officer: Michael Green
Contact Phone: 03 9290 1960

27 May 2005

**Mr Steve Bonett
Finlaysons
81 Flinders Street
Adelaide SA 5000**

Dear Mr Bonett

**Re: Third line forcing notifications No. N91712-5
lodged by Elders group**

I refer to the above third line forcing notifications lodged by Elders Limited (N91712), Elders Rural Bank Limited (N91713), Elders Insurance Limited (N91714) and Elders Insurance Brokers Pty Ltd (N91715) (collectively 'Elders') with the Australian Competition and Consumer Commission (the ACCC) on 16 May 2005. These notifications have been placed on the ACCC's public register. I note that you have requested confidentiality for Annexure A to the notifications. I have granted your request for confidentiality in relation to that annexure.

Elders has described the conduct as follows:

Elders will offer a reward under the terms of the Elders Cotton Assist (ECA) product on condition that the client spends a minimum \$50,000 on Elders merchandise between 1 June 2005 and 31 May 2006, and the client purchases at least one additional product from a range of banking and insurance products provided by related companies.

ECA is a package of merchandise, insurance and banking products provided to cotton growers by Elders.

Elders states that the rewards provided may take a number of forms including credit on further merchandise purchases, the provision of a range of agricultural services or the contribution of funds towards overseas tours or local charities. The value of the reward is directly linked to the value of spending on Elders merchandise in combination with the number of related banking and insurance products purchased.

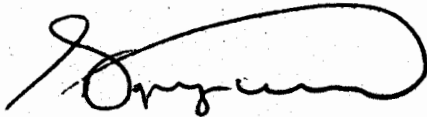


Legal immunity conferred by the notifications will come into force on 30 May 2005. On the basis of the information that you have provided, it is not intended that further action be taken in this matter at this stage.

As with any notification, please note that the ACCC may act to remove the immunity afforded by these notifications at a later stage if it is satisfied that the likely benefit to the public from the conduct will not outweigh the likely detriment to the public from the conduct.

This letter has been placed on the ACCC's public register. If you wish to discuss any aspect of this matter, please do not hesitate to contact Michael Green on 03 9290 1960.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Scott Gregson', with a large, sweeping flourish above the name.

Scott Gregson
A/g General Manager
Adjudication Branch