

Our Ref: C2005/780
Contact Officer: Liam Stewart
Contact Phone: 02 6243 1275

25 May 2005

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Dear

**Application for revocation of authorisation A90745 and substitute by replacement
authorisation A90972 lodged by Premium Milk Ltd**

The Australian Competition and Consumer Commission (the ACCC) has received an application from Premium Milk Ltd (Premium) for revocation of its authorisation A90745 and its substitution by an authorisation in similar terms (A90972).

I also note that Premium has requested that the ACCC grant 'interim' authorisation to these arrangements to allow immunity to continue while the ACCC considers its request for on-going authorisation.

This application relates to the collective bargaining arrangements authorised by the ACCC in September 2001. The immunity granted to these arrangements is due to expire on 30 June 2005. In summary Premium's application is seeking an extension of the immunity granted to these arrangements for an additional 5 years. A copy of Premium's application and supporting submission is attached for your information.

The purpose of this letter is to seek your comments, as a potentially interested party, in relation to Premium's applications for both interim and substantive authorisation.

The ACCC and the authorisation process

By way of background, the ACCC is the Australian Government agency responsible for administering the *Trade Practices Act 1974* (the Act). A key objective of the Act is to prevent anti-competitive conduct, thereby encouraging competition and efficiency in business, resulting in a greater choice for consumers in price, quality and service.

The Act, however, allows the ACCC to grant immunity from the Act for anti-competitive conduct in certain circumstances.

Authorisation is a process whereby the ACCC, in response to an application, has the power to grant immunity from court action for arrangements or conduct which might otherwise be in breach of the Act.

In order to grant authorisation the ACCC must be satisfied the public benefit arising from the arrangements outweighs any anti-competitive detriment. The authorisation process is conducted in an open and transparent manner – submissions from applicants and interested parties are generally publicly available from the ACCC's website, as is further general information regarding the authorisation process (www.accc.gov.au).

Request for submissions

As a potentially interested party you are invited to make a written submission to the ACCC regarding the likely public benefits and effects on competition of Premium's application. In particular, the ACCC would be interested in your views on the following:

- Do you agree with the public benefits that Premium have claimed will flow from the collective bargaining arrangements?
- Do you agree with Premium's comments in relation to the likely public detriment flowing from the collective bargaining arrangements?
- Do you consider that there might be any other detriment to the public caused by the arrangements?
- Do you have any other comments on the proposed collective bargaining arrangements?

The ACCC asks for submissions to be in writing so that they can be made publicly available. Submissions are placed on a public register and may also be placed on the ACCC's website. The ACCC may, where appropriate, supplement written submissions with discussions with relevant parties on a mutually convenient basis.

Should you lodge a submission with the ACCC you may request that information included in the submission be treated as confidential and not placed on the public register or the ACCC's website. In such circumstances you must justify why the ACCC should treat such information as confidential, otherwise it would be expected to be made public. The ACCC may take confidential information into account during its assessment of an authorisation application. Guidelines for seeking confidentiality are attached for your information.

If you wish to lodge a submission, please address it to:

The General Manager
Adjudication Branch
Australian Competition & Consumer Commission
PO Box 1199
DICKSON ACT 2602

Submissions can also be lodged by email to adjudication@accc.gov.au, or by facsimile on (02) 6243 1211.

Submissions regarding the substantive authorisation application should reach the ACCC by close of business **Friday 10 June 2004**. In addition, we request that submissions in relation to the interim authorisation reach the ACCC by close of business **Friday 3 June 2005**.

Should you have any queries or if you wish to discuss any aspect of this matter please telephone Liam Stewart on (02) 6243 1275.

Yours sincerely

Susan Philp
Acting Director
Adjudication Branch

Attachment A

GUIDELINES FOR CONFIDENTIALITY CLAIMS

The process whereby the ACCC assesses applications for authorisation or notification is very public, transparent and consultative. The Trade Practices Act 1974 (the Act) requires the ACCC to maintain a public register in respect of authorisation and notification applications.

Applicants and interested parties can request that a submission, or part of a submission, be excluded from the public register.

The ACCC is required under the Act to exclude from the public register upon request details of:

- (i) secret formulae or process;
- (ii) the cash consideration offered for the acquisition of shares in the capital of a body corporate or assets of a person; or
- (iii) the current manufacturing, producing or marketing costs of goods or services.

However, even if a document does not meet these technical requirements, the ACCC may still grant confidentiality where, in the ACCC's view, it is desirable to do so.

The Commission also has the discretion, under s89 of the Act, to exclude material from the public register if it is satisfied that it is desirable to do so, either by reason of the confidential nature of the material or for any other reason. The ACCC expects that a party claiming confidentiality on these grounds will present a case for its treatment in this manner.

Under Regulation 24 of the *Trade Practices Regulations*, when a request for confidentiality is made to the ACCC:

- (a) where the request is that a whole document be excluded, the words "Restriction of Publication Claimed" should appear in red writing near the top of each page; and
- (b) where the request is that part of a document be excluded, the words "Restriction of Publication of Part Claimed" should appear in red near the top of the first page of each document, and the part for which confidentiality is claimed should also be marked in red. A submission of more than 5 pages should also include a description of the whereabouts of the parts for which confidentiality is claimed.

Applicants, as a matter of course, should remove headers claiming "confidential communication" from all Emails and otherwise, unless they have a particular piece of information that they justify to the ACCC deserves exclusion from the public register. If confidentiality is not requested but a header cannot be removed, it should be clearly stated at the beginning of the communication that confidentiality is not requested.

If the ACCC denies a confidentiality request, the requesting party may ask that the material be returned. As a matter of practice, the ACCC will specify a period (usually 14 days) in which they can request the return of such material. Upon response, the ACCC will return the original material and destroy all associated copies. The ACCC will not consider this material when reaching its decision.

If the ACCC does not receive a response within the specified period, the original material will be placed on the public register.

Information or documents granted confidentiality may be used by the ACCC pursuant to its powers generally under the Act.

Our reference
ECS/PREM520-9016605
Your reference
A90745

FILE No:

DOC:

005/24568

MARS/PRISM:

21832

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A90972
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WESTGARTH**
lawyers

WORK FILE COPY

12 May 2005

By express post

Mrs Susan Philp
Australian Competition and Consumer Commission
PO Box 1199
DICKSON ACT 2602

Partner
Eddie Scuderi (07) 3228 9319
Email: eddie.scuderi@corrs.com.au

Sydney
Melbourne
Brisbane
Perth
Canberra
Gold Coast

Dear Madam

Authorisation A90745 to Premium Milk Ltd

We act for Premium Milk Ltd (Premium).

Thank you for your letter to Premium dated 6 April 2005.

Revocation and substitution of existing authorisation

Premium applies under s 91C of the *Trade Practices Act 1974* (Cth) for a revocation and substitution of its existing authorisation. In support of this application, Premium makes essentially the same submissions as it did in support of application A90745, subject to the points noted below.

First, due to changes in the dairy industry the number of producers has declined since Premium made application A90745:

- the total number of producers in Queensland as at 31 March 2005 is 909 (compared with 1,545 as at 30 June 2000);
- the total number of suppliers to Parmalat Australia Ltd (previously known as Pauls Limited) (Parmalat) as at 31 March 2005 is 389 (compared with 556 as at 30 June 2000);
- the number of Port Curtis Milk Suppliers' Co-operative Association Limited (PCMSCAL) suppliers is 63 (compared with 127 as at 30 June 2000).

Premium currently has 275 members, out of a possible 326 suppliers to Parmalat in south-east Queensland.

In light of this, Premium's submissions in support of authorisation A90745 apply even more strongly now than they did when Premium made its first application in 2000. The consolidation in the dairy industry in Queensland has reduced the number of producers significantly. The public benefit due to the countervailing power of producers that are allowed to collectively bargain (noted by the ACCC in paragraphs 7.38 to 7.44 of authorisation A90745) is more apparent now than it was in 2000.

Secondly, in relation to the figures noted by the ACCC in table 2.1 of authorisation A90745, Premium's understands that Queensland is currently ranked fifth out of the six States in

volume of milk production as at the end of February 2005, with a total of 5.76% of all Australian production. As at 30 June 2004, Queensland produced 6.98% of all Australian milk.

Thirdly, in paragraph 1.9 of authorisation A90745, the ACCC noted that PCMSCAL "has not yet formally joined Premium" (see also paragraph 7.20). Though this is still the case, during 2004 Premium and PCMSCAL reached an arrangement under which (among other things):

- PCMSCAL is entitled to appoint a director to the board of Premium; and
- another nominee of PCMSCAL is permitted to be a non-voting observer at Premium board meetings.

This arrangement is expressed to last until Premium's 2005 annual general meeting (which we understand will occur in November 2005). At that time, the arrangement will be re-evaluated. One possible result is that PCMSCAL members may become Premium members.

Premium notes that the prices and terms that Premium negotiates for its members tend to, in practice, have a flow-on effect to PCMSCAL suppliers.

Finally, Premium's application for revocation and substitution of its existing authorisation is fully supported by Parmalat. We attach a letter from Parmalat expressing its support for Premium's application.

Premium is happy to discuss its application for revocation and substitution further with the ACCC. Please contact Eddie Scuderi if the ACCC would like to do so.

Application for Interim authorisation

Premium requests that the operation of its current authorisation be extended until the ACCC determines Premium's application for revocation and substitution of authorisation A90745. Accordingly, Premium applies for an interim authorisation under s 91(2)(a)(iii) and (f) of the *Trade Practices Act* to preserve the status quo between the expiry of its current authorisation on 1 July 2005 and the ACCC's determination of Premium's application for revocation and substitution of the authorisation.

Such an authorisation would "enabl[e] due consideration to be given to" Premium's application for revocation and substitution of authorisation A90745 and avoid disruption to Premium members and Parmalat.

It would also avoid the substantial practical inconvenience of having the current collective bargaining arrangements, which have been in place since the ACCC's granting of authorisation A90745, being discontinued. This would require milk producers and Parmalat to engage in individual negotiations, which would be a costly exercise (therefore raising the prices of dairy products to the public), and possibly an exercise that would be ultimately otiose if the ACCC determines to grant a substituted authorisation that essentially continues the existing arrangements.

Premium notes that the ACCC considered the transaction cost savings of the current arrangements to have a public benefit, with "savings ... likely to be passed on to the final consumers" (paragraphs 7.45–7.46). In Premium's view, not granting the interim

authorisation, and thus requiring individual negotiations, will increase transaction costs for both producers and Parmalat, and lead to increased cost to consumers.

Premium also notes, as the ACCC observed in paragraph 2.9 of authorisation A90745:

It appears accepted in the industry that dairy farmers are in a weak bargaining position in relation to the disposal of their product—they are price takers. For example, the Commission understands that currently Pauls sets the prices payable to all producers that supply it with milk. These prices are established with some consultation with producers. However, there is little negotiation or right of veto if processors [*sic*, should be producers] are dissatisfied with the levels set by Pauls. This is the result of a combination of factors including the fact that market milk has a short shelf-life that must conform to rigid public health standards. Further, long lead times are required to develop and alter production patterns.

Premium is also happy to discuss the interim arrangements for which it applies with the ACCC. Premium invites the ACCC to contact Eddie Scuderi if the ACCC wishes to do so.

Yours faithfully
Corrs Chambers Westgarth



Eddie Scuderi
Partner

attachments

ATTACHMENT TO APPLICATION FOR AUTHORISATION BY PREMIUM MILK SUPPLY PTY LTD

BACKGROUND

As the Commission is aware, the Milk Industry in various States has deregulated. In Queensland, farmgate milk prices were deregulated from 1 July 2000.

Currently, Queensland has approximately 1,480 milk producers selling to three processors, Pauls Limited, Dairy Farmers' Co-operative Ltd and National Foods Limited. The two prominent processors are Dairy Farmers' Co-operative Ltd which represents approximately 900 producers and Pauls Limited which currently purchases milk from six supply co-operatives operating in various regions throughout Queensland and representing approximately 580 producers. The supply Co-operatives currently representing these producers are:

- Metropolitan Milk Producers Co-op Association Limited;
- Sunshine Coast Milk Co-op Association;
- The Burnett Milk Producers Co-operative Associated Limited;
- The Maryborough Co-operative Dairy Association Limited;
- Dairyfields Milk Suppliers Co-operative Limited; and
- Port Curtis Milk Suppliers Co-operative Association Limited.

The proposal for which authorisation is sought has been developed to reduce the negative impact of deregulation on producers by providing them with a more effective means by which to influence farmgate pricing supply arrangements and milk standards. This is done by allowing for collective bargaining of prices and standards through a representative body (Premium Milk Supply Pty Ltd) in direct negotiations with Pauls Limited. The elements of this proposal are more fully set out below.

DETAILS OF PROPOSAL

It is proposed to convert Premium Milk Supply Pty Ltd ("Premium") into a company limited by guarantee offering membership to the 580 producers currently selling milk to Pauls Limited ("Pauls") through six co-operatives. The rules of membership will provide for the following:

- Premium will be a not-for-profit organisation. Consequently, there will be no right to dividends.
- Members will be entitled to elect a board initially consisting of eleven directors and moving, over a two year period, to a board of eight;
- Members will agree to allow Premium to negotiate with representatives of Pauls on a Milk Management Committee in relation to:
 - milk quality and compositional standards required by Pauls;
 - prices to be paid for the various standards of milk required; and
 - volumes of milk required by Pauls Limited;
- Premium will not purchase milk from its members. Premium proposes to negotiate with Pauls on behalf of its members for the supply volumes, delivery requirements, quality

standards and prices that will apply for six monthly periods (or such longer periods as may be agreed). Members of Premium will be free to negotiate privately with Pauls or any other processor. However, a member who wishes to negotiate its own supply arrangements must first give Premium six month's notice. The notice period is designed to ensure continuity of supply for a reasonable period pending re-organisation of supply and demand arrangements to cater for Paul's loss of supply from the departing member.

- Pauls will not be bound by any exclusivity arrangement with Premium.
- For the purposes of the scheme, Queensland will be divided into 4 geographical zones having regard to different processing and consequent transport facilities. The producer members within each zone will be entitled to elect 2 Premium board members to represent that zone. The zonal system will take effect in year 3 of the scheme.

The second element of the proposal is to establish a Milk Management Committee with equal representation (three each) from Premium and Pauls. The Milk Management Committee's role will be limited to the determination of prices to be paid by Pauls to member producers for various classes of milk meeting the composition standards set by the Committee. The Committee will set prices and standards at regular intervals, initially being six monthly. The prices may vary amongst the four proposed zones to reflect different transportation costs to the nearest processing plant.

As stated above, despite Pauls Limited's involvement on the Milk Management Committee there will be no obligation on Pauls Limited to acquire milk at the relevant prices recommended by the Committee, and there will be nothing preventing Pauls Limited from acquiring milk from any member or any other party at the same or a different price.

Pauls wishes to participate in the scheme so as to ensure better security of supply at desired quality and composition standards and to encourage investment in technology by producers so as to improve efficiency and achievement of higher quality. Pauls considers that the proposed scheme is more likely to deliver those results than continuing to deal with six independent co-operatives as it currently does, or by dealing individually with each of the producers. The producers agree with that assessment based on experience in the co-operative environment.

Pauls will obviously also benefit from the reduced transaction costs associated with dealing with a single entity.

The object of the proposal is to better provide for the objective and transparent determination of prices, and quality and composition standards, and to give member producers an opportunity to influence prices and standards through collective negotiation. The success of the proposal will be entirely dependent on the effectiveness of the Milk Management Committee in setting reasonable prices and standards having regard to competitive forces. The lack of any compulsion on members (subject to the six month notice requirement), to sell, or on Pauls Limited to buy milk at particular prices, reinforces this view.

The 580 members of Premium are listed in the Schedule to this attachment. The proposed rules of membership have not been reduced to writing but will reflect the matters set out above.

GROUND'S FOR GRANT OF AUTHORISATION

It is submitted that any potential detriment to competition is outweighed by the public benefit associated with the proposal.

Any anti-competitive elements of the proposal are diminished because of the lack of any compulsion on member producers to sell, or on Pauls Limited to buy, at any particular prices established by the Milk Management Committee. In any event, even assuming that detriment to competition ensues, there are significant public benefits flowing from the proposal including:

- the creation of countervailing bargaining power in favour of member producers;
- the proposed arrangements will significantly increase the prospects of a smooth transition from a regulated to a deregulated farmgate price environment. (The parties are seeking a permanent authorisation subject to the Commission's power for review).
- collective negotiation of quality and compositional standards will create certainty for member producers and thereby allow for investment in new technology, plant and equipment to ensure that quality standards are achieved and improvements are made.

FACTS AND CONTENTIONS RELIED UPON IN SUPPORT OF THE APPLICATION FOR AUTHORISATION

Before dealing with the facts and contentions in support of the specific grounds for authorisation, it is worth noting some of the characteristics of the relevant sector.

In Australia, there are approximately 10.4 million litres of milk produced annually of which approximately 1,970 million litres constitutes drinking milk and 8,430 million litres constitutes manufacturing milk. Manufacturing milk prices in Australia are influenced heavily by import parity with New Zealand prices which in turn reflect world prices and exchange rates.

There is a very high volume of manufacturing milk available on the Australian Eastern Seaboard which will compete directly with the supply by Premium members.

There are three major processors on the Eastern Seaboard. These are Pauls Limited, Dairy Farmers' Co-Operative Limited and National Foods Limited. Of these, Pauls and Dairy Farmers' Co-Operative are the largest operators in Queensland. There is significant competition amongst the three major processors and in turn, the major supermarket chains have a very high degree of market power vis-a-vis the processors, and through home brands, are vigorous competitors of processors at retail level.

Victorian producers account for 64% of Australia's total milk production. Prices paid for milk in Victoria will therefore significantly impact the prices paid in other States.

Dairy Farmers' Co-Operative represents a approximately 900 producers and will exercise significant competitive influence over the prices paid by Pauls, particularly in light of the lack of any compulsion by Premium's members to sell to Pauls.

Whilst National Foods has only recently commenced processing operations in Queensland, National Foods is expected to provide a viable alternative buyer of Queensland milk.

Milk producers invariably have significant amounts of capital tied up in land, livestock and equipment. The nature of land holdings make alternative uses economically unviable for most milk producers.

The lead time for investment in major new technology is approximately 3 years. Consequently, security of demand is essential if producers are to adopt innovative production methods.

Countervailing Power

In the absence of a mechanism such as that being proposed, producers in a deregulated market will have very little bargaining power. There are a number of factors which contribute to this fact including:

- milk is a highly perishable product that reduces the producer's ability to negotiate. A means by which longer term prices and supply conditions can be determined, will overcome the difficulties arising from the nature of the product;
- the size of most producers in Queensland. Whilst there are a number of large volume producers, the majority of producers, and certainly the majority of those that would be represented by Premium, are smaller producers who do not have the financial capacity or volume to effectively negotiate individually with processors.

By contrast with the bargaining power of the producers, the processors are large corporate entities with significant financial capacity and the ability to source product from various suppliers.

In the case of Pauls, whilst it has significant bargaining power, it wishes to participate in the proposal to secure for itself, longer term security of supply at appropriate standards of quality and composition. Pauls could not achieve this result by simply negotiating on an individual basis with 580 or more producers or through six independent co-operatives as currently occurs. There are administrative as well as tangible benefits from negotiating such matters through a single body.

It should also be noted that in the absence of a scheme such as that being proposed, the 580 producers to be represented by Premium will be at a significant disadvantage in comparison with the 900 members of Dairy Farmers' Co-operative Limited. The Dairy Farmers' Co-op producers have a producer Board representing their interests.

Investment in New Technology

Dairy farming has become increasingly capital intensive. There is a direct correlation between the quality of milk produced and the amount invested in technology. On average, major investment in new technology carries a three year lead time.

In order for dairy farmers to make that capital investment, they need security of return in the short to medium term. The current proposal, whilst not guaranteeing any sales of milk to Pauls, gives the relevant producers sufficient certainty (particularly if the scheme operates effectively for the first year) to create an incentive to make the necessary investment in technology.

The incentive to make the investment is further enhanced by the tangible benefits flowing from attainment of the relevant standards set by the Milk Management Committee.

Smooth Transition to Deregulation

It is submitted that there is a clear benefit in any mechanism which provides for a smooth transition from a regulated industry to a deregulated one. Whilst the current proposal seeks to reduce the adverse effects of complete deregulation of farmgate prices, the fully negotiable nature of the price at the Committee level, and the lack of any compulsion to sell or buy at a negotiated price, preserves the competition benefits that deregulation seeks to achieve.

It is also submitted that the countervailing power which the proposal provides in favour of the producers will also add to a smooth transition to a deregulated industry, and will provide producers with some encouragement to make investment in technology so that longer term production efficiencies can be achieved and improved.

SCHEDULE

**LIST OF PROPOSED PREMIUM MEMBERS
AND OTHER PARTIES TO THE SCHEME**

Premium Milk Supply Pty Ltd

Pauls Limited

List of producer members attached.

Name	Company	Address	Salutation
Mr Ron Turnbridge		20 McLean Rd Mt Mee QLD 4521	Mr Turnbridge
Mr George Freeck		MS 126 Muldapilly QLD 4307	Mr Freeck
Mr Hans Gerick		308 Mullins Rd Goomboorian QLD 4570	Mr Gerick
CP & PF Barbeler		114 River Rd Tinana QLD 4650	Sirs
M & B Quinn	Sunny Brae	MS 571 Murgon QLD 4605	M & B Quinn
PA & RG Braithwaite		PO Box 145 Murgon QLD 4605	PA & RG Braithwaite
Mr Peter Varghese Director General	Dept of Primary Industries	GPO Box 46 Brisbane Qld 4001	Mr Varghese
Mr Andrew Reitz Chief Executive Officer	Metcash	4 Newington St Silverwater NSW 2128	Mr Reitz
Mr Peter Margin Managing Director	National Foods	Pura House 5 Queens Rd Melbourne VIC 3004	Mr Margin
Mr John Fletcher	Chief Executive Officer Coles Myer	800 Toorak Rd Tooronga VIC 3000	Mr Fletcher
The President	Queensland Dairyfarmers	183 North Quay Brisbane QLD 4000	Si/Madam
Mr Roger Corbett Chief Executive Officer	Woolworths Ltd	Level 5 540 George St Sydney NSW 2000	Mr Corbett
Mr Brian Fisher	Executive Director ABARE	Edmund Barton Building Broughton & Macquarie Streets BARTON ACT 2600	Mr Fisher
Mr Paul Sutton	Department of Agriculture Fisheries and Forestry	GPO Box 858 CANBERRA ACT 2601	Mr Sutton
Dr Mike Ginnivan	Managing Director Dairy Australia	Locked Bag 104, Flinders Lane Victoria 8009	Dr Ginnivan
Mr John McQueen	Chief Executive Officer Australian Dairy Farmers Ltd	6 th Floor, 84 William Street MELBOURNE VIC 3000	Mr McQueen
Executive Director	NSW Dairy Farmers Association	Level 7 179 Elizabeth St SYDNEY NSW 2000	Sir/Madam
Mr David Mathews	General Counsel Fonterra	Private Bag 92032 Auckland NZ	Mr Mathews

Mr Bruce Donnison	General Manager Bonlac Foods Ltd	PO Box 4313 MELBOURNE VIC 3004	Mr Donnison
Mr Brett Wright	Group Secretary Dairy Farmers	PO Box 72 Lidcombe NSW 1825	Mr Wright
The Group Secretary	Dairy Farmers Co- operative	1/60 Enterprise Pl TINGALPA QLD 4173	Sir/Madam
The Company Secretary	Murray Goulburn Co- operative Co Ltd	140 Dawson Street BRUNSWICK VIC 3056	Sir/Madam
The General Manager	Metropolitan Milk Producers Co- operative	216 Laceys Creek Road DAYBORO QLD 4521	Sir/Madam
The General Manager	Suncoast Milk Producers Co- operative	"Walwyn" Farm 4 Shadbolt Road Mothar Mountain via Gympie QLD 4570	Sir/Madam
The Chief Executive	Norco Co-operative	PO Box 486 LISMORE NSW 2480	Sir/Madam
The Chief Executive	Cooloola Coast Milk Supplies	23 Cooloola Drv RAINBOW BEACH QLD 4581	Sir/Madam
The General Manager	Port Curtis Dairy	PO Box 212 MONTQ QLD 4630	Sir/Madam
The Chief Executive Officer	Queensland Dairy Authority	Private Mail Bag No 5 Roma Street BRISBANE QLD 4003	Sir/Madam
The Chairman	Burnett Milk Producers Co- Operative Assoc	PO Box 28 MURGON QLD 4605	Sir/Madam
The Chief Executive	Maryborough Co- operative Dairy Association Ltd	PO Box 218 MARYBOROUGH QLD 4650	Sir/Madam
The Chief Executive	Port Curtis Milk Suppliers Co- operative	PO Box 1007 ROCKHAMPTON QLD 4700	Sir/Madam
Mr Ben Fargher	Chief Executive Officer National Farmers Federation	PO Box E10 Kingston ACT AUSTRALIA 2604	Mr Fargher
Ms Brianna Casey	Executive Director Queensland Farmers Federation	PO Box 12009 George St Brisbane QLD 4003	Ms Casey
Mr Ray Johnson	Chief Executive NSW Farmers Association	GPO Box 1068 Sydney NSW 2001	Mr Johnson
The President	Australian Milk Producers Association	RMB 1640 Tongala VIC 3621	Sir/Madam