



**BLUE CIRCLE
SOUTHERN**

**BLUE CIRCLE SOUTHERN CEMENT LIMITED
Victorian Region Distribution**

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22nd March 2007

The General Manager
Adjudication Branch
Australian Competition and Consumer Commission
P.O. Box 1199
Dickson ACT 2602

FILE No:
DOC:
MARS/PRISM:

Re: Geelong Ports Application for Exclusive Dealing

Dear Sir,

I recently received a letter from Toll Geelong Port advising of the Port's decision to apply to the ACCC for an Exclusive Dealing arrangement for the Figees Cranes at Lascelles Wharf.

Blue Circle Southern Cement has received approximately 270,000 tonnes of cement clinker across Lascelles Wharf over a two year period. The majority of this cement clinker has been unloaded using the Figees Crane System with the remainder being received in self discharging vessels which required the use of a third party hopper.

Blue Circle Southern Cement has found the Figees Cranes to be a highly efficient unloading system. They have ensured that vessels are turned around in the shortest possible time thereby reducing the risk of vessel queuing which is in the best interests of all Port users.

Cement clinker by its nature is a dusty product and both Toll Geelong Port and Blue Circle Southern Cement have worked together to develop an effective dust management system that manages any environmental impact on ship discharge.

The use of the Figees Crane system incorporating an enclosed grab and integrated hopper arrangement linked with our dust extraction system has proven the most effective system in controlling dust when compared to a self discharge vessel and third party hopper.

Blue Circle Southern Cement supports Toll Geelong Port's application for an exclusive dealing arrangement.

Yours faithfully

Ian Duncan
Distribution Manager
BCSC Victorian Region

RECEIVED BY ACCC 28 MAR 2007
