



# Victorian Farmers Federation

*Horticulture Group*

15 October 2007

Mr Scott Gregson  
General Manager Adjudication  
Australian Competition and Consumer Commission  
PO Box 1199  
Dickson ACT 2602

Dear Mr Gregson,

The following documents pertain to an application for Authorization by the Victorian Farmers Federation Sunraysia Branch to collective bargaining. The VFF asks that this Authorization be considered under the new streamlined Authorization process.

The application is seeking authorization to collectively bargain between VFF Sunraysia Branch dried vine fruit growers and processors of their fruit as a collective group.

Included in the documents is a letter from the ACCC regarding a fee waiver for this application.

If there are any problems or queries about the application or enclosed documents, please do not hesitate to contact me on the numbers listed below.

Yours sincerely

Lis Blandamer  
Manager  
VFF Horticulture Group

VFF Horticulture Group  
Ph: 03 9207 5571 Fx: 03 9207 5576  
e-mail: [lblandamer@vff.org.au](mailto:lblandamer@vff.org.au)

**Form B**  
Commonwealth of Australia  
*Trade Practices Act 1974 — subsection 88 (1)*  
**AGREEMENTS AFFECTING COMPETITION:**  
**APPLICATION FOR AUTHORISATION**

To the Australian Competition and Consumer Commission:

Application is hereby made under subsection 88 (1) of the *Trade Practices Act 1974* for an authorisation under that subsection:

- to make a contract or arrangement, or arrive at an understanding, a provision of which would have the purpose, or would have or might have the effect, of substantially lessening competition within the meaning of section 45 of that
- to give effect to a provision of a contract, arrangement or understanding which provision has the purpose, or has or may have the effect, of substantially lessening competition within the meaning of section 45 of that Act.

PLEASE FOLLOW DIRECTIONS ON BACK OF THIS FORM

**1. Applicant**

(a) Name of Applicant:  
(Refer to direction 2)

**The Victorian Farmers Federation Sunraysia Branch (VFF Sunraysia Branch).** A 91064

(b) Short description of business carried on by applicant:  
(Refer to direction 3)

**The VFF Sunraysia represents members from all horticultural commodities in the Sunraysia area and is a Branch of the VFF Horticulture Group.**

(c) Address in Australia for service of documents on the applicant:

**24 Collins Street, Melbourne Victoria 3000**

**2. Contract, arrangement or understanding**

(a) Description of the contract, arrangement or understanding, whether proposed or actual, for which authorisation is sought:  
(Refer to direction 4)

**The ability of present and future members of the VFF Sunraysia Branch to collectively negotiate the terms and conditions (including price) of dried vine fruit with present and future dried vine fruit processors. The VFF Sunraysia Branch would also have the ability to negotiate on behalf of those members.**

(b) Description of those provisions of the contract, arrangement or understanding that are, or would or might, substantially lessen competition:  
(Refer to direction 4)

**Please refer to the attached Authorisation submission**

(c) Description of the goods or services to which the contract, arrangement or understanding (whether proposed or actual) relate:

**Dried vine fruit such as, but not limited to, sultanas, raisins, currants**

(d) The term for which authorisation of the contract, arrangement or understanding (whether proposed or actual) is being sought and grounds supporting this period of authorisation:

**Application is sought for five years as current contracts for dried vine fruit are between three to five years in length. This is addressed in more detail in the attached submission.**

**3. Parties to the proposed arrangement**

(a) Names, addresses and descriptions of business carried on by other parties or proposed parties to the contract or proposed contract, arrangement or understanding:

**Please see Appendix A of Authorisation submission**

(b) Names, addresses and descriptions of business carried on by parties and other persons on whose behalf this application is made:  
*(Refer to direction 5)*

**Please see Appendix A of Authorisation submission**

**4. Public benefit claims**

(a) Arguments in support of authorisation:  
*(Refer to direction 6)*

**Please refer to the Authorisation submission**

(b) Facts and evidence relied upon in support of these claims:

**Please refer to the Authorisation submission**

**5. Market definition**

Provide a description of the market(s) in which the goods or services described at 2 (c) are supplied or acquired and other affected markets including: significant suppliers and acquirers; substitutes available for the relevant goods or services; any restriction on the supply or acquisition of the relevant goods or services (for example geographic or legal restrictions):  
*(Refer to direction 7)*

**Please refer to the Authorisation submission**

**6. Public detriments**

(a) Detriments to the public resulting or likely to result from the authorisation, in particular the likely effect of the contract, arrangement or understanding, on the prices of the goods or services described at 2 (c) and the prices of goods or services in other affected markets:  
*(Refer to direction 8)*

**Please refer to the Authorisation submission**

(b) Facts and evidence relevant to these detriments:

**Please refer to the Authorisation submission**

**7. Contract, arrangements or understandings in similar terms**

This application for authorisation may also be expressed to be made in relation to other contracts, arrangements or understandings or proposed contracts, arrangements or understandings, that are or will be in similar terms to the abovementioned contract, arrangement or understanding.

(a) Is this application to be so expressed?

**Yes.**

(b) If so, the following information is to be furnished:

(i) description of any variations between the contract, arrangement or understanding for which authorisation is sought and those contracts, arrangements or understandings that are stated to be in similar terms:

*(Refer to direction 9)*

**Future members of the VFF Sunraysia Branch and future processors of dried vine fruit.**

(ii) Where the parties to the similar term contract(s) are known— names, addresses and descriptions of business carried on by those other parties:

**Refer to submission**

(iii) Where the parties to the similar term contract(s) are not known — description of the class of business carried on by those possible parties:

**Refer to submission**

**8. Joint Ventures**

(a) Does this application deal with a matter relating to a joint venture (See section 4J of the *Trade Practices Act 1974*)?

**No**

(b) If so, are any other applications being made simultaneously with this application in relation to that joint venture?

**Not applicable**

(c) If so, by whom or on whose behalf are those other applications being made?

**Not applicable**

9. Further information

(a) Name and address of person authorised by the applicant to provide additional information in relation to this application:

Lis Blandamer  
Manager  
VFF Horticulture Group  
24-28 Collins Street  
Melbourne Vic 3000  
Tel: 03/ 9207 5571  
Fax: 03/ 9207 5576

Jim Belbin  
VFF Sunraysia Branch  
PO Box SM1  
MILDURA SOUTH VIC 3501  
Tel: 0419 320 530  
Fax: 5021 1147

Dated 16 October 2007

Signed by/on behalf of the applicant

Lis Blandamer  
.....  
(Signature)

Lisbeth Blandamer  
.....  
(Full Name)

Manager Horticulture Group  
.....  
(Position in Organisation)



**Victorian Farmers Federation**

*Horticulture Group*

# **Submission for Authorization**

**By the Victorian Farmers Federation  
Sunraysia Branch (VFF Sunraysia Branch)**

## **Introduction**

This submission is in support of the Victorian Farmers Federation Sunraysia Branch (VFF Sunraysia Branch) application for authorization for collective bargaining pursuant to section 88(1) of the *Trade Practices Act 1974*.

The purpose of the VFF Sunraysia Branch's application for authorization is to allow the VFF Sunraysia Branch to engage in collective bargaining negotiations on behalf of its members with present and future dried vine fruit processors.

The authorization is sought for a period of five (5) years.

No members will be required to enter into any agreement with a processor negotiated by VFF Sunraysia Branch on behalf of its members. Members of VFF Sunraysia Branch are, and will remain, entitled to negotiate individual contracts with any processor.

## **The Victorian Farmers Federation Sunraysia Branch (VFF Sunraysia Branch)**

The VFF Sunraysia Branch is an active Branch under the Victorian Farmers Federation Horticulture Group, which is a commodity of the Victorian Farmers Federation. It was formed to represent the interests of Victorian horticultural farming businesses in the Sunraysia region in and around Mildura, Victoria. It provides lobbying and advocacy to its members through the VFF Horticulture Group Policy Council and the VFF's Committee structure.

The Branch represents vine fruit (table, wine and dried), citrus and vegetable growers. There are currently 42 members of the VFF Sunraysia Branch.

The members of the VFF Sunraysia Branch have agreed for this Authorization application to be submitted on their behalf.

Membership to the Branch is controlled through the VFF Horticulture Group and is via a yearly subscription. This subscription covers the VFF contribution and provides a per member refund for the operation of the Branch.

The dried fruit growers collect a levy from its members for investment into research and development of their industry.

## **Target**

The aim of the VFF Sunraysia Branch in seeking authorization to collectively bargain is to be able to allow its members to negotiate with the processors of their produce as a collective group. There may be other businesses which growers may wish to collectively bargain with in the future.

This Authorization submission does not seek collective boycott provisions.

## **Background**

It is estimated that the Sunraysia region has over 700 dried vine fruit growing businesses that produce 95 per cent of the Australia's dried grapes.

The main varieties grown are sultanas, currants, raisins and sunmuscats. Dried fruit production totals 10,729ha and produces 27,907 tonnes.<sup>1</sup>

Sunbeam currently has a near monopoly on the processing of dried vine fruit in Australia. Sunbeam has approximately 80 per cent of the market share. Clynes has approximately 18 per cent and others the remaining 2 per cent. Individual growers negotiate with companies for contract price on a 3-5 year cycle. Individually growers are often confused about whether the contracts they are signing are fair and feel that there are few options in which to sell their produce.

It is acknowledged that individual growers are generally in a weak bargaining position when dealing with large processors, especially those that compete on a global market.

The nature of the dried vine fruit industry means that growers are required to invest considerable amounts in resources, land, labour and water. Once the investment has been made they then become 'locked in' to growing dried vine fruit and are vulnerable to company pressure which can be applied to growers who need contracts with companies to sell their produce. The companies know the pressure the growers are under to sell their produce and can use their situation against them. Prices are traditionally not provided to growers until just before harvest leaving the grower very little choice but to accept the price given.

Contracts between large companies and growers are a commonly agreed option for both parties. Contracts ensure that a company has the dried vine fruit it will need, and the grower is ensured a confirmed market for their produce. Most growers are contracted. These contracts are signed after the vines have been planted. Processors publish prices annually usually just before harvest. At the same time prices are also published for uncontracted fruit which is usually considerably lower.

Processors usually set prices against the world price, taking into consideration the exchange rate. There is a world commodity market for dried sultanas which is linked to the Turkish market as Turkey is the dominant world dried sultana exporter. The grading system used worldwide (other than in Australia) is usually the same grades determined by Turkey. Australia has developed its own grading system but is in line with the Turkish system.

Sunbeam and other processing companies will liaise with manufacturers such as Uncle Toby's, Sanitarium, Kellogg etc and provide them with a quantity and price sought. The manufacturers then assess the Turkish import price and provide processors with a price they are prepared to pay. Processors then provide their prices to growers accordingly.

### **Proposed Conduct**

The conduct for which authorization is sought is ("proposed arrangements")

- a. the negotiation by the VFF Sunraysia Branch negotiating committee, of the terms, conditions and price of an agreement between the processor and members of the VFF Sunraysia Branch.

- b. The participation of the VPGC in any dispute resolution mechanism in relation to disputes between processors and members of the VFF Sunraysia Branch with regards to the supply.

The VFF Sunraysia Branch wishes to apply for authorisation on behalf of its dried vine fruit grower to:

- Allow an agreement between those members to collectively bargain terms and conditions of growing contracts with dried vine fruit processors. It is proposed that negotiations will be undertaken by grower representatives within the VFF Sunraysia Branch.
- Allow the VFF Sunraysia Branch to participate in any dispute resolution process between members of the VPGC and potato buyers concerning the contracts collectively negotiated.

### **Authorization Sought**

Authorization is sought for the VFF Sunraysia Branch members to collectively negotiate terms and conditions (including price) of dried vine fruit sales to processors.

The proposed arrangements apply to all dried vine fruit for supply to dried fruit processors. Each of the groups listed in Appendix A acts autonomously, as individuals in the dried vine fruit industry.

The addition of other members under the VFF Sunraysia Branch may be necessary in the future therefore the Branch requests that the ability to apply for the addition of the new parties to the addendum lists in the future if required.

### **Parties to the Proposed Arrangements**

The parties to the proposed arrangements are present and future members of the VFF Sunraysia Branch.

Pursuant to sections 88(10) and 88(13) of the Trade Practices Act 1974 (ch), the authorization application applies to any collective bargaining group of VFF Sunraysia Branch members, present or future, who wish to engage in the proposed arrangements.

Attached as Appendix A is a list of present dried vine fruit members of the VFF Sunraysia Branch as at 1<sup>st</sup> October 2007.

### **Details of Negotiation**

Negotiation between growers and processors over contracts has been an integral part of the dried vine fruit industry for many years now. Grower groups find that there is certainly strength in numbers and often processors find that negotiating with a single group of growers is often far more agreeable for both parties than holding negotiations with single growers.

Negotiating with one dried vine fruit processor over another is a reasonably similar process. All processors have contracts ranging from 3-5 years. Usually it is the grower who contacts the processor and advises what they can supply and negotiations commence from there.

Upon commencing negotiations the negotiating group would meet with the processor to review the previous year and to discuss intake for the coming season. Because the contracts are for 3-5 years this gives both the grower and processor some certainty.

Current contracts are signed to supply but are often not negotiated. The grower is provided with a supply contract and then either agrees to supply or looks elsewhere. There is little negotiation of terms and there is no indicative price given. This may also have to do with the fact the growers are small suppliers as individuals. Negotiating under an Authorization will give growers an opportunity to secure terms and conditions for supply of a larger portion of produce.

If the committee feels that what is being offered is less than reasonable and/or unable to be recommended to growers, then a grower meeting is called. At this meeting growers will be advised of the conditions surrounding the company position and will be provided with as much information as is able to be obtained by the grower group. The meeting will be asked to provide a directive to the committee about the grower price and conditions. The negotiation committee representatives will transfer this information to the company, generally at a meeting called for this purpose.

Sometimes representatives from the relevant company will attend a grower meeting to put their position. The representatives will then leave the meeting. The members will consider the information provided and advise the committee about the direction required to be taken. The committee will transfer this request to the company.

Once an agreement has been reached, the committee then recommends acceptance.

If the offer is not able to be accepted because it does not fit the understanding of what is desired, the committee may call another grower meeting, or, if there is a total impasse then the committee can recommend that individual growers consider their own position, having regard to the viability of the offer, etc.

The parties who participate in the negotiation process are grower representatives who are always elected from the commodity meetings. The committee members must be dried fruit growers of the VFF Sunraysia Branch.

### **Dispute Resolution Process**

The VFF Sunraysia Branch will only represent growers that are fully paid members of the Branch.

Tonnages to be contracted and acceptance of the price and conditions, following discussions with the negotiating representative group will always come down to a decision for the individual grower as to whether to accept the negotiating committee and company's agreed price.

In the event an agreement between a representative negotiating committee and a company cannot be achieved, the procedure is the negotiating committee will likely recommend that growers should consider their individual positions and suggest that growers negotiate individually with the company. The dispute resolution process does not reduce the scope for individual growers to negotiate variations on collectively negotiated arrangements or to negotiate with their processor individually outside of the authorised arrangements.

No boycott provision is sought in the Authorization submission and will not be included in any part of the negotiations or dispute resolution.

### **Other parties affected**

Other parties likely to be affected or who might have an interest in the proposed arrangement, fall into three categories

Consumers

Growers outside the Authorization

Retailers

Consumers of dried vine fruit are unlikely to be adversely affected through this Authorization as growers will still have to compete with imports and other growers.

All members of the VFF Sunraysia Branch retains the right to decide not to be part of any shared process conducted by VFF Sunraysia Branch, but reach an agreement with processors independently and separately.

### **Public Benefits of the proposed arrangements**

The test for Authorization is:

- whether the proposed arrangement is likely to result in a benefit to the public; or
- whether that benefit would outweigh the detriment to the public constituted by any lessening of competition that would be likely to result from the proposed arrangement.

The Branch believes the public benefits to this Authorization are both economic and non-economic.

The major benefit will be insuring the dried vine fruit industry remains viable thus supporting the sustainability of the local community.

Approval of this Authorization will also encourage investment in the industry to upgrade technologies particularly in areas such water savings. Again this provides the multiplier affects to the local community and jobs to the region.

This Authorization will assist with limiting the market power of large processors over growers. Efficiency gains can also be made by correcting existing market imbalance. Monopsony and oligopsony power impedes the industry in maximizing efficiency gains.

The VFF Sunraysia Branch considers the collective bargaining approach will also provide some stability to an industry that has been operating under difficult market conditions which has seen a decline in confidence and investment within the industry. This decline is felt within the community as a flow on affect.

Growers are traditionally price takers, usually informed of the price just before harvest. This Authorization will provide a chance to get some surety of pricing so growers can make business decisions in a timely manner not when the produce has already been grown and looking for a market.

Another public benefit is the environmental benefits that will come with efficiency gains and the take-up of new technologies, particularly water saving technologies.

Clyne Foods, which has about 18 per cent market share, has indicated its willingness to support an application for Authorization to collectively negotiate. This will allow the processor to gain certainty of supply while dealer not with a multitude of individuals but with one negotiating group.

### **Anti Competitive Detriment**

It is unlikely that the activity of growers in collectively bargaining will have any significant effect on consumers.

Consumers are unlikely to see a change in price as growers will still face competition from other growers in and imports. The growers share of the retail price is approximately 13 – 15 per cent. This means that any price increase to growers would only ever be small, relative to the consumer price.

For instance, the delivered factory price being paid to growers of processing dried vine fruit is currently around \$1200 -1300 per tonne. The same dried vine fruit when sold to consumers by major retailers in Melbourne will have a value of around \$7,500 – 8,000 per tonne.

It could also be argued that there is no immediate need for any price increase to be passed to consumers. The level of retailer discounting which occurs almost on a weekly basis would indicate there is much flexibility in the system.

If Victorian growers are not able to achieve a realistic return and the local industry ceases to exist then it would be expected that Australian consumers would have to pay considerably more should product be solely imported.

### **Term of Authorization**

Most of the contracts with dried vine fruit growers are done on a three to five year basis. Growers and suppliers are keen to continue with contracts of this length, therefore we seek an Authorization period of five years. The negotiating team will be seeking to secure some sort of price structure into the contracts to ensure the contracts are fair and equitable to both parties.

Longer term contract are generally acceptable to both growers and buyers as they provide some stability to the industry.

### **References**

1. Grow Mildura Region, Profiling the food, wine and dry land farming industries of the Mildura region – 2005

## Appendix A

Current dried vine fruit members of the VFF Sunraysia Branch and their contact details as at 1st October 2007. We seek that these names can be amended during the period of the Authorisation.

Name	Address	Phone number
NJ & JL Smith	PO Box 471, Merbein, Vic 3505	5025 2723
CF & ME Thomson	PO Box 19, Curlwaa NSW 2648	5027 6254
RL & EE Rigby	PO Box 495, Merbein, Vic 3505	5025 2422
MJ&JM Cupper	PO Box 246, Merbein, Vic 3505	5025 2249
P & S Chapman	PO Box 378, Merbein, Vic 3505	5025 3093
MJ & EJ Cowling	PO Box 128, Red Cliffs, Vic 3496	5024 3338
Frasca and Sons	PO Box SM64, South Mildura, Vic 3501	
Ashcroft Vineyards	PO Box 199, Dareton, NSW, 2712	
TH & D Lee	PO Box 89, Merbein, Vic, 3505	5025 2761
C W Holdsworth	Box 371, Dareton, NSW, 2717	5027 4573
G & LG Pollifrone Pty	PO Box 6, Cabarita Vic 3505	5023 0706
V & M Petrolo Pty	PO Box 636, Irymple, Vic 3498	5023 1479
Oratai Pty Ltd	PO Box 481, Merbein, Vic, 3505	5025 2411
T & G Sergi	PO Box 321, Red Cliffs, Vic 3496	5024 1748
North West Primary Producers	PO Boxes SM132, Mildura, Vic 3501	5022 1385
FG & F Pedulla	PO Box 120, Red Cliffs, Vic 3496	5024 2214
F & M Dimasi	PO Box 251, Irymple, Vic 3498	5024 8220
G & E Garreffa	PO Box 5101, Mildura, Vic 3502	5024 5355
Raztek Holding Pty Ltd	PO Box 406, Irymple, Vic 3498	5024 6234
AJ & R Hudson	121 McCarthys Rd, Merbein, Vic 3505	5025 3281
Murray Lea Nurseries Pty Ltd	Box 201, Red Cliffs, vic 3496	5024 3245
Romeo Producers	Box 52, Cardross, Vic 3496	5024 1812
TA & JA Hunyadi	PO Box 96, Cabanta, Vic 3505	5025 3281
D L Taylor	PO Box 124, Dareton NSW 2717	5027 4653
ID & RD Morrison	249 Merindah Rd, Dareton NSW 2717	5027 4527
I Heaysman	PO Box 8, Dareton NSW 2717	5027 4275
F & L Mammome	Box 799, Irymple, Vic 3498	5024 7447
WK & PB Macdonald	Box 109, Dareton NSW 2717	5027 4584
RJ & JS Byrnes	RSD Lot 8 Sturt Highway, South Merbin Vic 3505	5027 4893
C & J Dichiera	5 Murray Ave, Red Cliffs, Vic 3496	5024 3337
JW & JL Hunt	PO Box 583, Red Cliffs, Vic 3496	5024 3241
BL Smith	RSD Paschendal, Merbein, Vic 3505	5025 2517
WR & KE Judd	PO Box 262, Dareton NSW 2717	5027 4626
LW Underwood	PO Box 105, Dareton NSW 2717	
Sunset Sultanas Management	PO Box 540, Nangiloc, Vic 3494	5029 1550
Sunset Vineyard Management	PO Box 540, Nangiloc, Vic 3494	5029 1550
J & J Webley Pty Ltd	PO Box 21, Dareton NSW 2717	5027 4538
Paolucci Holdings	PO Box 487, Red Cliffs, Vic 3496	5024 2224
W T McClumpha	PO Box 461, Red Cliffs, Vic 3496	5024 3133
HM Tankard Pty Ltd	PO Box 281, Nichols Vic 3501	5024 5557
O & P Sapuppo	PO Box 115, Gol Gol, NSW 2738	5024 8744
J C H Miller	PO Box 323, Mebein, Vic 3505	5023 5627
P & KM Williams	PO Box 445, Red Cliffs, Vic 3496	5024 1158
RM & HP Davis	PO Box 70, Cardross, Vic, 3496	5024 3184

## **Appendix B**

Major processors of dried vine fruit in Victoria that currently negotiate with growers about terms and price.

Sunbeam Foods  
1554 Koorlong Ave  
PO Box 21  
IRYMPLE VIC 3498  
Tel: 03/ 5051 4400  
Fax: 03/ 5024 7066

Clynes Foods  
262 Henty Highway  
WARRACKNABEAL VIC 3393  
Tel: 03/ 5394 1515  
Fax: 03/ 5394 1818



**Australian  
Competition &  
Consumer  
Commission**

Our Ref: C2007/102  
Contact Officer: Louise Hird  
Contact Phone: (03) 9290 1484

GPO Box 3131  
Canberra ACT 2601  
23 Marcus Clarke Street  
Canberra ACT 2601  
tel: (02) 6243 1111  
fax: (02) 6243 1199  
www.accc.gov.au

14 ~~13~~ August 2007

Lis Blandamer  
Manager Horticulture Group  
Farrer House  
24-28 Collins St  
Melbourne Vic 3000

Email: [lblandamer@vff.org.au](mailto:lblandamer@vff.org.au)

Dear Ms Blandamer

**Fee waiver request**

I refer to your letter of 13 August 2007 to the Australian Competition and Consumer Commission (ACCC) in respect of a proposed application for authorisation. In your letter you have requested that the fee to be paid in relation to an application for authorisation to be lodged by the Victorian Farmers Federation Sunraysia Branch (the Branch) be waived in whole.

In support of your request, you submitted the following information:

- the Branch is a not-for-profit organisation
- the Branch has a limited budget
- Branch members are in a difficult financial position, noting the recent drought and difficult circumstances faced by growers in the area.

As a person authorised to assess fee waiver requests for and on behalf of the ACCC, I wish to advise that the application fee to be paid by the Branch has been waived in whole. No application fee will apply with respect to the application for authorisation to be lodged by the Branch.

This decision has been made on the basis of the Branch's limited financial situation and the current financial circumstances of its members. The decision will remain in force for a period of three months. The three month period will expire on 13 November 2007.

A copy of this letter should accompany the application for authorisation to be lodged by the Branch. The cover letter to the application should mention that a letter from the ACCC regarding a fee waiver is enclosed with the application. The application together with this letter will be placed on the public register at that time.

If the application for authorisation is lodged by the Branch after 13 November 2007 a full application fee of \$7500 will apply, unless a subsequent request for a fee waiver is made and ultimately approved by the ACCC.

Should you have any queries in relation to this matter, please do not hesitate to contact Louise Hird on (03) 9290 1484.

Yours sincerely

A handwritten signature in black ink, appearing to be 'S. Gregson', with a long horizontal flourish extending to the right.

Scott Gregson  
General Manager  
Adjudication Branch