

22 October 2013



Dr Richard Chadwick
General Manager
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Australian Competition and Consumer Commission
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**FEDERAL CHAMBER
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Dear Sir

**Australian Amalgamated Terminals Pty Limited – Minor
Amendment to Authorisation**

I refer to your letter of 26 September 2013 inviting the Federal Chamber of Automotive Industries (FCAI) to comment on the proposed amendment to the Authorisation granted to Australian Amalgamated Terminals (AAT) reference A91141-A91142 and A91181-A91182. The FCAI has contacted relevant members and the comments below are provided to assist in your inquiry.

We understand that the ACCC is aware that the proposal to allow AAT to operate Appleton Dock within the port of Melbourne is seen as a step in increasing efficiency during the period of construction associated with the new Webb Dock East and Webb Dock West facilities. FCAI has conducted its own internal modelling of indicative vessel movements and vehicle imports and exports and we are of the view that the Port of Melbourne Corporation approach is indeed the approach most likely to see a minimisation of any disruption and lead to the most efficient operation of the port during the period of significant disruption.

On the condition that the restrictions and processes in place for the current AAT operations, as reflected in the main through the terms of Attachment D to the current Authorisations, apply equally to the operations at Appleton Dock FCAI has no objection to the proposed minor amendment. FCAI would also seek some guidance from the ACCC as to the expectations around existing Appleton Dock pricing and the applicability of that pricing model to apply to users of the facility despite the change in terminal operator. FCAI is of the view that following the change of terminal operator the users should be no worse off than if the current arrangements had remained.

Please feel free to call on 02-6229 8217 if you require any further information.

Yours faithfully

Tony McDonald
Director
Industry Operations