

28 October 2016

Jaime Martin  
Assistant Director Adjudication  
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Dear Assistant Director

**A91558 – Queensland Cane Growers Organisation Ltd – submission**

The Australian Cane Farmers Association Limited (ACFA) supports the Canegrowers' application for authorisation, namely that;

*Canegrowers seeks authorisation for Canegrowers and the relevant local Canegrowers organisations to collectively bargain across three levels:*

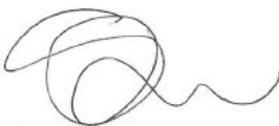
- a) within each district with the local mill owner and marketer*
- b) across and between each district that has common mill ownership with the common mill owner and sugar marketer and*
- c) across and between each district with any and all mill owners and sugar marketers.*

The ACFA submits that, in order to maintain a competitive position, when supplying a monopoly miller, it is necessary for growers;

- To have a contractual line of site from cane supply contracts through to contracts for the marketing of raw sugar; especially as those contracts are related and provided for in Qld legislation;
- To have the ability to collectively bargain within and across regions;
- For growers and their bargaining representatives to be able consult their fellow representatives and specialist advisers in related entities.

The ACFA further supports that the Authorisation is sought for ten years.

Yours sincerely,



Stephen Ryan  
General Manager