

19 January 2017

Attention: Ms Hannah Ransom
Adjudication Branch
Australian Competition & Consumer Commission
23 Marcus Clarke Street
Canberra
ACT 2601

BY EMAIL: adjudication@accc.gov.au

Dear Ms Ransom,

Re: A91550 – British American Tobacco Australia Limited & Ors - Submission

We refer to the above application for authorisation from British American Tobacco Australia Limited, Imperial Tobacco Australia Limited and Philip Morris Limited to identify, issue warnings, suspend and/or cease supply of their tobacco products to retailers and wholesalers who sell illicit tobacco products.

We note that by letter dated 19 September 2016, MGA advised that we unequivocally support the application and urged the ACCC to authorise the application as it is in the public interest and would be a significant step in combating illicit tobacco.

MGA has considered the ACCC's reasons for its proposal to deny authorisation of the application, however in principle we continue to support the application as the effort to minimise or limit the sale of illicit tobacco is in the public interest, even if the result is a lessening of competition.

MGA sincerely thanks the ACCC for the opportunity to make submissions regarding this application and we would be pleased to explain our position further should the ACCC require additional information.

Yours sincerely,



Jos de Bruin

CEO

MGA Independent Retailers