



21 August 2020

David Hatfield  
Director  
Adjudication Branch  
Australian Competition & Consumer Commission  
GPO Box 3131  
CANBERRA ACT

By Email: [Adjudication@acc.gov.au](mailto:Adjudication@acc.gov.au)

Dear Mr Hatfield

**Inghams Group Ltd – AAA1000527**

The Victorian Farmers Federation (“VFF”) incorporates Inghams, Turosi and Hazeldene Grower Group Branches and most chicken growers in Victoria are members of one or other of those branches.

The VFF accepts that the Victorian Government’s Stage 4 COVID-19 restrictions are likely to have significant impacts on chicken meat processing and supply and that it is in the interests of all industry participants, including growers, to cooperate in mitigating these inputs.

In principle the VFF supports the granting of authorisation to Inghams if this will assist to mitigate these impacts. However, the conduct sought to be authorised is expressed in very general terms and despite the assurances of absence of negative effects on growers it is not possible to assess what impacts on growers there may be.

It is noted that under the terms of the interim authorisation the parties to the application are required to report to the ACCC on a weekly basis with respect to decisions relating to the proposed conduct made by a COVID Working Group, and that the ACCC proposes to publish such reports. To date there does not appear to be any published report.

Given the generalised nature of the conduct which has received interim authorisation and the absence of specifics, it is considered essential that there should be regular and prompt publication of reports as to decisions taken with respect to the proposed conduct, and that the ACCC should closely monitor the conduct through its further powers to meet with the parties and to obtain information.



**Victorian  
Farmers  
Federation**

It is also noted that the duration of the authorisation sought is the period until 31 December 2020, but that the authorisation can be revoked. It is considered important that the ACCC should keep under review the necessity for continuation of the authorisation, particularly in the event that COVID restrictions are lifted or modified by the State Government.

Subject to the above comments, the VFF supports the granting of the authorisation.

Yours faithfully

**Vince Croston**  
**VFF Chicken Meat President**