

To whom it may concern

I make this submission in my personal capacity as a grain producer in Western Australia and not in my capacity as a director of Co-operative Bulk Handling Limited (CBH). The views set out in this submission are my own and do not constitute the official position of CBH.

- **Role and effectiveness of WEA in meeting the objectives of the act**

The role of the WEA should be to guide rather than adhere to the strict compliance stance it appears to be taking. Deregulation is new to the wheat industry and the adjustments all the stakeholders have to make will take some time. To get it right and achieve the intent of the legislation a conciliatory approach instead of confrontational approach is needed in the immediate future. A culture change in the wheat industry is taking place and enforcing a strict stance to the objectives of the act will only go to hurt the wheat industry further, rather than help through this transitional period. A more clearly defined role for the WEA needs to be introduced where it helps the industry not inhibits its growth and ultimately international competitiveness.

- **Eligibility criteria for accreditation of exporters**

The accreditation of the now 23 exporters has no guarantee that those exporters can meet payment obligations to the growers who contract to them. This should be the paramount criteria to be accredited as an exporter. A ranking system of the abilities of the exporters to meet payment obligations should be considered.

Simpler models need to be considered such as the ESCOSA model as currently to meet the eligibility it appears to have be an onerous, expensive and time consuming process where those costs are ultimately born by the wheat growers of Australia. This reduces again wheats international competitiveness where other exported grains do not have this additional cost burden. Ultimately bureaucratic impost loses out to the natural forces of supply and demand over time so review the value of the WEA sooner rather than later.

- **Access test requirements for accreditation of port operators as exporters**

Existing laws are already in place to enforce port operators to have open commercial and fair access to ports such as Trade Practices Act and Bulk Handling Act. Anti-competitive legislation prohibiting companies abusing monopoly powers already exist in current legislation. Why place another layer of compliance criteria when restrictive trade practices legislative powers already exist? This extra layer only increases the costs of the port operators who wish to export in comparison to other accredited export licence holders therefore not achieving the intent of the access undertaking in making it a level playing field for all.

The real test of deregulation of the wheat industry is not to impose more compliance and regulatory costs on the wheat industry. It appears the reverse is happening; deregulation is increasing costs through the burden of over compliance therefore affecting the competitiveness of the wheat industry on the world stage.

- **Level of competition in the supply chain logistics for wheat**

Alternative supply chains such as on-farm storage and alternative port loading facilities (other than wheat ship loaders) already exist. If market forces are left to prevail these alternative systems will grow if the existing supply chain is uncompetitive over time. Inhibiting these natural supply and demand forces through rules will restrict the industry in moving on in the future. Wheat should not be treated any different to other grains which are exported. Cost / Benefit analysis should be the first test of any new rules imposed. What are the net tangible benefits of any rule change?

- **Availability and transparency of market information**

Market information and availability is subject to existing privacy act provisions and the rights of the individual owners of the information. The grains industry is no different to any other industry such as the banking and financial industry where individual information is protected. Release of individual information is prohibited without permission of the individual owners of that information. Grain handlers (like banks) are the custodian of that information and cannot release sensitive market shaping information to the advantage of others without individual's approval.

The release and collection of such information is government responsibility and only in the interests of the industry as a whole and not for individual gain.