FROM: MALCOLM GOODING, WA 6350

I WISH TO MAKE A FEW GENERAL COMMENTS ONLY , DUE TO TIME CONSTRAINTS

FIRSTLY IT IS A BIT TOO EARLY TO BE MAKING ANY DEFINITIVE STATEMENTS AS TO HOW THE NEW WHEAT MARKETING REGIME IS GOING......IT NEEDS AT LEAST FIVE YEARS BEFORE A TRUE PICTURE EMERGES. HOWEVER THERE ARE SOME POINTS THAT NEED TO BE RAISED AND DEALT WITH QUICKLY TO STOP A FAIR BIT OF NONSENSE THAT IS OCCURRING.

IN WA, SOME TRADERS ARE BAD MOUTHING CBH'S GRAIN EXPRESS AND OTHERS ARE SINGING IT'S PRAISES. WHO IS RIGHT? BECAUSE THE BULK OF WAS GRAIN IS EXPORTED, GRAIN EXPRESS IS THE ONLY WORKABLE MODEL THAT CAN AND DID MEET BOTH GROWERS AND MARKETERS NEEDS AT AN AFFORDABLE PRICE AND AT THE SAME TIME GUARANTEEING QUALITY SPECS FOR HUGE TONNAGES OVER A RELATIVELY SHORT PERIOD, AS WAS THE CASE EARLY THIS YEAR.

I BELIEVE THAT THE AQUIRERS WHO ARE WHITE ANTING THE CBH GROUP AS A WHOLE ARE REALLY TARGETING THE GRAIN POOL IN AN ATTEMPT TO GAIN A BIGGER MARKET SHARE AND ARE LEVERAGING AGAINST THE CBH GROUP AT EVERY OPPORTUNITY. WEA SHOULD DEMAND PROOF OF ANY WRONG DOING BY THE CBH GROUP FROM THE COMPLAINANTS AND PUBLISH THE FINDINGS SO FARMERS CAN MAKE THEIR OWN JUDGEMENT AS TO THE VALIDITY OF THE CLAIMS.

THERE ALSO APPEARS A BIAS IN FAVOUR OF THE OFF SHORE REGISTERED GRAIN TRADERS BY THE ADMINISTERING AUTHORITIES. INSTEAD OF A NEUTRAL STANCE OR EVEN A RECOGNITION THAT CBH IS A FARMER BUILT CO-OP OF MANY YEARS STANDING AND HAS NEVER HAD AN ADVERSE FINDING MADE AGAINST IT..TOO MANY BARRIERS ARE PUT IN FRONT OF IT BY WAY OF COMPLIANCE AND GOVERNANCE ISSUES BECAUSE OF A PERCIEVED EXPECTATION THAT IT WILL WROUGHT THE SYSTEM. CBH NEEDS MAXIMUM THROUGH PUT TO INCREASE IT'S VIABILITY, SO WHY ON EARTH WOULD IT RISK THE IRE OF THE WEA AND RISK LOSING IT'S EXPORT LICENCE BY ENTERING INTO DODGY PRACTICES. TAKE SOME OF THE PARANOIA OUT OF THE INDUSTRY INSTEAD OF ADDING TO IT BY GIVING SUSTENANCE TO THE ARGY BARGY WHICH IS TOTALLY UNNECESSARY. MAKE THE COMPLAINANTS ACCOUNTABLE AND SEE WHERE THAT TAKES US.

IN MY VIEW, THE ISSUES PAPER HAS TOO MANY ISSUES IN IT. PLEASE DEAL WITH THE IMPORTANT ONES THAT NEED ADDRESSING, AND THERE WILL BE A FEW.....AND TRYING TO PARE EVERY THING DOWN TO THE SMALLEST CENT ALONG THE WAY IS RARELY BEST PRACTICE. IT IS IRONIC THAT IN THE NEW DEREGULATED ENVIORMENT THERE ARE FAR MORE REGULATION AND COMPLIANCE COSTS FOISTED ONTO THE GRAINS INDUSTRY THAN WAS IN THE REGULATED ERA, WHICH AT THE END OF THE DAY IS CARRIED BY US FARMERS AS PER USUAL. HAVE SOME FAITH!!