

Please accept this as my submission to the grain handling inquiry into the ownership arrangements of Graincorp by ADM.

Re (b) there are potential impacts on competing grain traders' access to grain handling facilities, ports, silos and transport infrastructure

Currently Graincorp own, but do not maintain or use the majority of vertical grain storage sites throughout the country.

In the ADM 'Bidder's statement' they 'will operate the grain assets of Graincorp in largely the same manner as Graincorp would have operated them in the ordinary course'

Therefore the conclusion can be drawn that the currently unused and unmaintained sites will remain that way. Because Graincorp has a virtual monopoly of grain storage and handling this forces growers into less advantageous logistics options at harvest time by redirecting traffic to Graincorp's preferred sites. As these unused sites are not available for use by others it is anti competitive.

As they are unused, and will remain unused, It is my opinion that ADM ought to be forced to divest themselves of the hundreds of currently unused vertical storage facilities. To not do so will impact on competing grain traders' access to silo infrastructure.

I also define graingrowers as grain traders.

Thank you  
Grant Wilson  
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Vic.