



Response to the Inquiry into the Taxation of Alternative Fuels Legislation

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AUSTRALIAN LOT FEEDERS' ASSOCIATION (ALFA)

Level 5, 131 Clarence St Sydney NSW 2000

Executive Summary

The Australian Lot Feeders' Association (ALFA), the peak body for the cattle feedlot industry, appreciates the opportunity to provide input into the House of Representatives Standing Committee inquiry into the *Taxation of Alternative Fuels Legislation*. This response will confine its comments to the proposed taxation arrangements applicable to ethanol as this is where our principle concerns lie.

As our submission articulates, ALFA believes that given the significant and distortionary subsidy assistance and protection provided to ethanol manufacturers by the current fuel excise arrangements over a number of years, such manufacturers should be required to pay the full 25c /litre excise from December 2011, as originally intended by the Howard Government. In contrast, the alternative fuel amendment bills propose that only 12.5c/ litre will be paid by ethanol manufacturers from 2020 (after grant entitlements have been taken into account). This situation when compared to the original Howard Government proposal will lead to the Federal Government losing \$851 million in fuel excise revenue or \$703 million in lost fuel excise revenue when compared to the 2010/11 Federal budget announcement (given the doubling of the phase in period). For the NSW monopoly ethanol producer Manildra alone, the subsidy from the Labor/ Windsor deal represents a benefit of \$543.75 million over the 10 year period to 2020/21. The additional benefit to Manildra from this deal compared to the original 2010-11 Federal Government budget proposal over the same 10 year period is \$93.75 million. These figures are conservative as they assume that Manildra's will not expand beyond its current 300 mega litres capacity over this time, an unlikely proposition given their current monopoly status in NSW.

Importantly, from the perspective of alternative grain users such as the cattle feedlot industry, given that ethanol is produced from food crops in Australia (eg grain), the policy will perpetuate inflationary grain and food price pressures particularly during dry seasons when crop yields are low. As Australian grain prices are a function of domestic and international grain prices, this alternative fuels legislation will continue to aggravate the impacts of US biofuels policy which has been a major contributing factor that has led to record global grain and food prices this year. This is unsurprising given that 40% of the US corn crop (the world's largest grain crop) will be diverted to ethanol and not food production this year.

The bills demonstrate yet again the flawed nature of 'infant industry' assistance which leads to complacency, inefficiency and advocacy efforts for further Government support by ethanol producers (rather than increased competitiveness). The bills will also continue the misallocation of resources towards inefficient and unviable ethanol production and away from the commercialisation of superior advanced and second generation ethanol technologies. The recent example of the Dalby bio-refinery going into voluntary administration proves that Government's should not provide such assistance for industries that are unable to be commercially viable without it. The answer for Government is not to increase infant industry assistance as proposed but to remove it so that market forces can prevail and companies are forced to be competitive and efficient.

As set out in the General Agreement on Tariffs and Trade (GATT) rules, the fuel excise arrangements represent a subsidy to ethanol producers. ALFA is opposed to subsidies and indeed any form of Government assistance and protection for grain derived ethanol production as they artificially distort grain markets by creating inflationary price pressures. As grain is the single largest cost of production for beef, chicken, pork, eggs and dairy products, these respective producer industries are placed at a competitive disadvantage compared to both the ethanol industry (in which it competes for grain) and our international counterparts (in which we compete for markets).

The proposal to double the phase in period for the ethanol industry to pay the equivalent fuel excise to importers was agreed by the Labor Party at the behest of NSW Independent Tony Windsor as a political agreement to allow it to form Government. Notably, the proposal will still ultimately lead to the ethanol industry paying only half the fuel excise it is eligible for (on an energy content basis) and only a third of the 38.143c/ L payable by its competitors at the end of the phase in period.

The arguments put forward to justify the fuel excise relief subsidy for the ethanol industry; namely fuel security, regional development and environment have been proven to be flawed with the negligible benefits provided more than offset by the costs of Government intervention to society. A more detailed explanation has been provided within this submission.

Notably, the subsidy provides significant financial benefits to only 3 ethanol producers in Australia yet negatively impacts millions of food and fuel purchasing consumers, livestock producers and tax payers. Ethanol is incompatible for 30% of cars, 70% of motorbikes, 100% of boats and almost all 2 stroke engines such as mowers, wippersnippers, hedge trimmers etc. These engine owners will be forced to pay for more expensive premium unleaded as regular unleaded becomes unavailable. This concern is very real with the sales of regular unleaded declining by 49% in NSW since March 2007. The news is no better for owners of E10 compatible vehicles, with drivers forced to pay more for fuel as ethanol has inferior fuel economy compared to regular unleaded petrol.

Unfortunately the political deal (if it were to be supported in Parliament) will extend the unintended and negative impacts of Government assistance and protection towards grain derived ethanol production; ie

- Higher grain and food prices particularly during low grain production periods.
- Distorted grain markets by the artificial competitive advantage provided to the ethanol industry over other users of grain
- Complacency, inefficiency and moral hazard issues by ethanol producers (rather than increased competitiveness)
- The misallocation of resources towards inefficient and unviable ethanol production
- Stymied investment and commercialisation of superior advanced and second generation ethanol production technologies
- The aggravation of the negative monopoly impacts in NSW from the further subsidisation of Manildra
- The cost to the Federal Government from \$851 million in lost fuel excise revenue
- Are inconsistent with Australia's World Trade Organisation stance in support for deregulation and reduced Government protection.

ALFA believes that the Federal Government should remove the excise relief and import protection for ethanol producers and differentiate their support and protection for ethanol production so that preferential treatment is provided towards superior advanced and non-grain based ethanol technologies. These technologies are more cost-effective, environmentally beneficial, have greater energy output to input ratios and eliminate 'food versus fuel' arguments.

Recommendations

- **The immediate removal of excise relief and import tariffs for grain based ethanol production.**
- **Provide preferential Government treatment for superior non-grain and advanced ethanol production technologies.**

Introduction

ALFA is the peak representative body for the lot feeding industry. The Australian feedlot industry has a value of production of approximately \$2.7 billion while employing some 2000 people (all in rural areas) directly and almost 7000 more indirectly. Approximately 40 per cent of Australia's total beef supply, 80 per cent of beef sold in major domestic supermarkets and the majority of production growth in the beef industry over the last 10 years has originated from the expanding feedlot sector. More than one third of the national slaughter comes to market after being finished in feedlots and more than 60 per cent of feedlot beef is exported into premium international markets.

The World Trade Organisation's General Agreement on Tariffs and Trade rules state that a subsidy exists if 'government revenue that is otherwise due is foregone or not collected'¹. The net effect of the current (and proposed) fuel excise arrangements for ethanol producers therefore can only be interpreted as a subsidy to the ethanol industry. The economic effect of subsidies upon markets is widely understood - in the ethanol context they lead to increased supply resulting in rising demand and prices for grain.

Grain represents the single largest cost of production for beef, pork, milk and chicken. In a normal season 80% of Australia's east coast grain production is consumed by these intensive livestock industries with the feedlot sector being the largest user among these with 3.7 million tonnes. As a result of Government assistance and protection mechanisms such as subsidies, there is inflationary pressure on the costs of production for these intensive livestock industries. This is particularly the case during low grain production years when the conflicting food versus fuel demands for grain will become most prominent.

The world is set to face considerable challenges to meet its ever increasing demand for food over the next few decades with the role of Australia's intensive livestock industries likely to be critical. With the world's population forecast to hit 9.2 billion in 2050, global food production is required to more than double between now and then. If this were not challenging enough, we are expected to do it with less water, less greenhouse gas emissions, less arable land, less fertiliser, less fuel and oil; less Government research and development and less grain due to increasing world ethanol production. Importantly, we have already hit peak oil, peak water, peak phosphorous and peak arable land – will we hit peak food?

Grain is the key ingredient for approximately 52% of Australia's current ethanol capacity. With current State and Federal Government ethanol policies providing no preferential treatment for advanced and second generation biofuel technologies (thereby stymieing investment and commercialisation), the current reliance on grain based ethanol production will likely continue for some time yet. Australia already struggles to meet current grain demand for 'food' (with grain imported from Western Australia to the east coast during dry periods) let alone future fuel demand. With forecasts of increasingly irregular grain supply into the future (due to climate change) and rising grain demand (fuelled by Government assistance and protection measures for the ethanol industry) there will inevitably be food price pressures.

Role of Australian Governments in relation to biofuels

There are a suite of State and Federal Government assistance and protection measures for the ethanol producing sector.

State and Federal Governments in Australia provided \$95mill in support to the biofuels industry in 2006/07, with the ethanol component providing more assistance per litre than in the US².

At a Federal Government level, assistance to meet the current 350 megalitre biofuels target comprises capital grants up to \$10mill per plant, excise relief and an effective tariff (ie 5% plus the 38.143c/ litre excise) on imported ethanol until 1st July 2011. There is also a \$15mill 'Second Generation Biofuels Program' which aims to support the research, development and demonstration of new biofuel technologies. The Program provides grants ranging from a minimum of \$1 million to a maximum of \$5 million and will fund up to 50 per cent of eligible expenditure on approved projects.

The subsidy provided by the current and proposed fuel excise arrangements for ethanol producers is large. For the NSW monopoly ethanol producer Manildra for example, the subsidy from the Labor/ Windsor deal represents a benefit of \$543.75 million over the 10 year period to 2020/21. The additional benefit to Manildra from this deal compared to the original 2010-11 Federal Government budget proposal over the same 10 year period is \$93.75 million.

¹ GATT Uruguay round agreement, Article I.1a(ii)

² International Institute of Sustainable Development – 'Biofuels – at what cost?' 2008

	Fuel excise saving from Labor/ Windsor deal	Additional fuel excise saving from Labor/ Windsor compared to original proposal
2011/12	71,250,000	3,750,000
2012/13	67,500,000	7,500,000
2013/14	63,750,000	11,250,000
2014/15	60,000,000	15,000,000
2015/16	56,250,000	18,750,000
2016/17	52,500,000	15,000,000
2017/18	48,750,000	11,250,000
2018/19	45,000,000	7,500,000
2019/20	41,250,000	3,750,000
2020/21	37,500,000	-
TOTAL	543,750,000	93,750,000

From another perspective, the Federal Government will lose \$543.75 million in potential fuel excise revenues from Manildra alone as a result of this Labor/ Windsor deal. In total the Federal Government will lose \$703 million in excise revenues from the ethanol industry over the same time. If the subsidy that Manildra is provided under the Labor/ Windsor deal were to be considered in the context of the 38.143c/ L which its competitors currently pay, then Manildra receives a benefit of \$938 million over the 10 year period.

To place the economic impact of these subsidies on competing grain users in context, the following example is pertinent. Grain is the biggest cost of production for ethanol producers and Manildra purchases 200,000 tonnes of wheat/ sorghum each year exclusively for this purpose³. In 2011/12 the subsidy provided by the Labor/ Windsor deal will equate to a benefit of \$356 per tonne of grain. This means that the subsidy allows Manildra to pay up \$356 for each tonne of grain purchased in the market place. Currently wheat prices (delivered Newcastle) are approximately \$277 whilst sorghum (delivered Newcastle) is approximately \$255. Accordingly, the net effect of the subsidy is that Manildra can pay \$79 more than current market prices for wheat and \$101 more than current market prices for sorghum. Therefore the subsidy not only provides a competitive advantage against other domestic grain consumers but also allows it to purchase grain at prices higher than normal demand and supply fundamentals would dictate. As a result, this applies inflationary pressure on grain prices to levels beyond normal market equilibriums.

ALFA's concerns with the proposal to extend the proposed fuel excise phase in period and the current excise relief arrangements in general are as follows;

1. They provide a subsidy to grain based ethanol producers thereby imposing inflationary grain and food price pressures. This has the affect of potentially negatively impacting upon jobs in rural areas for negligible fuel security and environmental benefit.
2. They do not provide any preferential treatment for superior advanced ethanol production technologies, thus stymieing investment and delaying its commercialisation. Current opinion is that such technology won't be commercialised for another 5-10 years. The Federal Government should encourage the early onset of such technologies given that they are more cost-effective, environmentally beneficial, have greater energy output to input ratios and eliminate 'food versus fuel' arguments. However, current fuel excise relief arrangements are identical between grain based and advanced ethanol technologies despite the latter's recognised advantages. As a result, the disadvantages of current technologies are perpetuated and investment into the research and commercialisation of superior second generation ethanol technology is delayed. ALFA believes that the current \$15mill 'Second Generation Biofuels Program' does not provide enough commercial incentive for investors to

³ This figure does not take into account the grain that it purchases for flour manufacturing which when converted to waste starch may end up being used for ethanol production.

actively research advanced ethanol technologies. Whilst comparisons need to be placed in perspective, in early 2007, the U.S. Department of Energy provided a comparatively larger amount (\$385 million) in grant funding to six second generation ethanol plants⁴.

3. They support a company which is already earning supernormal profits from its monopoly ethanol producing status in NSW. As stated previously, the current arrangements provide Manildra an effective subsidy of \$543 million over the next 10 years. While the market distortions from this 'infant industry' type assistance is significant, the fuel distributing and service station sector has also publicly raised concerns about the misallocation of resources and supernormal economic rents achieved by Manildra's monopoly position in the market.
4. They are based on a false premise ie that they provide potential fuel security, environmental and regional development benefits. This is evidenced by the 2003/04 budget policy announcement which makes it clear that not only will the ethanol industry only have to pay a reduced 'energy content' based excise but they will receive a further 50% cut due to potential fuel security, environmental and regional development benefits. However, to continue to make the case for an extension of the fuel excise benefits on these grounds (despite the overwhelming evidence suggesting that these arguments are flawed at best) is policy anathema. The Federal Government needs to learn from history and remove the excise relief completely.

Why the arguments in favour of ethanol production are flawed

There are three principle arguments touted by the ethanol lobby as to the benefits of ethanol production and hence why Government assistance and protection should be provided; fuel security, regional development and environment. The following explains why these arguments have no foundation;

1. Fuel security

The fuel security argument is flawed because currently ethanol in Australia can only be commercially produced from biomass feedstock's (eg wheat, sugar cane and sorghum) and these are affected by our significant climatic variability. Accordingly the fuel produced is similarly vulnerable to such variability. In addition, Australia's crop production is also too small to have any significant impact on our fuel needs without starting to impact upon food production. The world's largest ethanol producer (the US) has identical issues in that even if 100% of its corn crop is diverted to ethanol production, only 7% of its fuel needs would be met.

Currently Australia's ethanol industry is unable to meet the supply requirements of the 4% NSW mandate (let alone the planned 10% mandate in July 2011) whilst the proposed 5% Queensland mandate was recently suspended as it was felt that ethanol would have to be imported to meet its mandate needs. Obviously the requirement to import ethanol would only exacerbate fuel security issues.

The flawed nature of the fuel security argument is supported by various studies into the issue. For instance, the most comprehensive Australian study on biofuels⁵ to date concluded that *'there is currently no case for the government to accelerate the uptake of these fuels on energy security grounds. To do so would involve additional costs for consumers, with few energy security benefits'*.

The Victorian inquiry into biofuels agreed in its conclusion that *'the fuel security benefits from biofuels would be marginal and negatively influenced by the impacts of drought and disease on crops such as wheat and sorghum'*⁶.

2. Regional development

The regional development argument is flawed because the jobs created by a Government assisted ethanol industry are difficult to justify and are more than offset by job losses in other more viable rural industries that compete with it

⁴ "DOE Selects Six Cellulosic Ethanol Plants for Up to \$385 Million in Federal Funding". United States Department of Energy. 2007-02-28. <http://www.doe.gov/news/4827.htm>.

⁵ Australian Government, *Securing Australia's Energy Future*, op. cit., p. 124.

⁶ Victorian inquiry into mandatory ethanol and biofuels targets, Feb2008

for grain. ABARE has estimated that while 648 direct and indirect jobs would be generated by meeting Australia's current biofuel target of 350 megalitres, the annual cost of maintaining each of these jobs was \$321,000 per year. The high cost of job creation means that it would be cheaper to pay each worker average weekly earnings to do nothing than to subsidise them to produce ethanol.

As previously mentioned the proposed 5% Queensland mandate was recently suspended due to concerns that ethanol would have to be imported to meet its supply requirements. Even if the regional development argument had validity, the mandate would have only provided regional development benefits in other countries.

3. Environment

The environmental argument is flawed because production of grain based ethanol uses almost the same amount of fossil fuel as the ethanol itself replaces. The CSIRO has concluded for instance that grain derived ethanol provides only a 1-4% green house gas benefit and only two thirds of the energy of conventional fuel (meaning more ethanol is required over the same number of km's).

Concerns regarding the negligible environmental benefits have prompted a number of reports to conclude that the industry should not receive Government assistance and protection on these grounds;

The Federal Government Taskforce on biofuels concluded that *'greenhouse gas benefits alone would not warrant further assisting biofuels, given the availability of much cheaper carbon reduction options'*⁷.

The Victorian inquiry into biofuels concluded that *'achieving emission reductions through existing emissions trading markets were 5 times less expensive for Government than support for biofuels production'*.

The report *'Biofuels - at what cost?'* by the International Institute of Sustainable Development' found that *State and Federal Government biofuels industry assistance could achieve 100 times the reduction in greenhouse gases if it were instead used to purchase CO2 equivalents through the Chicago Climate Exchange'*⁸.

Notably, whilst there have been a number of life cycle studies concluding that there is a net environmental benefit of grain derived ethanol production, these in general have failed to take into account the greenhouse gas emissions from fertilizer use in production and the carbon emitted as forests and grasslands are converted to biofuels.

In addition, Manildra Australia's largest ethanol producer has arguably delivered inferior environmental outcomes from an emissions, particulate matter and water pollution perspective in recent years. For instance, it indicated in its Environmental Impact Statement (EIS) for its Bomaderry plant, that its upgrade will generate an additional net 230,000 tonnes of CO2-equivalent emissions a year. It has also breached the Protection of the Environment Operations Act for polluting local creeks whilst having over 1,900 incidents of non-compliance with its environmental licence. The arguments surrounding particulate matter emission benefits from E10 are also not definitive with one recent Australian report in particular concluding that E10 blend from wheat starch waste emits 24 milligrams of PM10 per kilometre whereas Australian unleaded petrol emits only 18 milligrams. The US EPA last year also determined that its biofuels legislation will adversely increase ozone concentrations over much of the U.S, by as much as 1 ppb. On the basis of the ethanol produced and Manildra's own figures, ALFA has also considerable reservations regarding the claimed proportion of ethanol generated from so called 'waste' as distinct from grain starch thereby questioning the food versus fuel credentials of such ethanol production.

Role of alternative sources of energy

First generation ethanol technologies generally use food crops as the primary ingredient. However, there are significant concerns about the environmental, social and economic impacts of first generation biofuels. An alternative

⁷ Australian Government, *Report of the Biofuels Taskforce to the Prime Minister*, op. cit., p. 7.

⁸ International Institute of Sustainable Development – 'Biofuels – at what cost?' 2008

is advanced and second generation biofuels which are produced from non plant sources such as municipal waste or the non-sucrose, non-starch and non-oil parts of plants that do not compete with food production. These biomass feedstocks include agricultural waste, forest waste and dedicated biomass energy crops grown on marginal land.

Current concerns for many, but not all, of the 1st-generation grain based ethanol technologies are that they:

- due to competition with food crops, can only produce biofuel up to a certain level before threatening food supplies and increasing food prices;
- are not cost competitive with existing fossil fuels such as oil,
- are an expensive option for energy security taking into account total production costs excluding government grants and subsidies;
- provide only limited greenhouse gas reduction benefits (with the exception of sugarcane ethanol) and at relatively high costs in terms of \$/tonne of carbon dioxide (\$/t CO₂) avoided;
- are accelerating deforestation (with other potentially indirect land use effects also to be accounted for);
- potentially have a negative impact on biodiversity; and
- compete for scarce water resources in some regions.

To the contrary, advanced and second-generation biofuels offer a number of superior advantages:

- They enable energy to be produced from products which have no alternative value and in contrast are a major disposal issue eg municipal waste. Given Australia's population is primarily located in metropolitan regions and issues of waste and land fill are increasing, advanced biofuels provide a win for Governments, industry, consumers and the environment.
- They don't utilise food producing crop biomass as a core ingredient meaning that there are no food versus fuel issues.
- They are able to be produced from a much wider range of raw material, including cheap, low-maintenance perennial crops that can be grown on a wider variety of land than conventional food or oil crops. This can significantly lower the cost of the feedstock.
- The resulting fuels are high-quality and clean-burning, with potentially a much lower life cycle greenhouse gas emission profile than other liquid fuel options (lignocellulosic ethanol can reduce greenhouse gas emissions by around 90% when compared with fossil petroleum)⁹
- The cultivation process (if any) could be less environmentally intensive than for ordinary agricultural crops. Lower intensity of cultivation will result in even lower greenhouse gas emissions from cultivation.
- They can be co-produced with electricity.

Unfortunately, advanced and second generation biofuel technologies have are not yet been commercialized with industry insiders suspecting that this is still approximately 5-10 years away. From a scientific perspective the challenge that advanced and second generation biofuel processes need to address is to extract ethanol in a cost efficient and competitive fashion. From a policy viewpoint, the challenge is to provide commercial incentives to encourage research and investment so that commercialization is expedited. However, as stated previously, the current Federal Government biofuel policy arrangements do not differentiate between first generation and advanced and second generation biofuels. Accordingly, the disadvantages of current technologies are perpetuated and investment into the research and commercialisation of superior advanced and second generation ethanol technology is delayed.

Conclusion

ALFA strongly urges the Federal Government to discontinue its fuel excise subsidy for grain derived ethanol production and in particular not support the extension of excise relief as proposed within its deal with the NSW Independent Tony Windsor.

The proposed fuel excise arrangements are a significant subsidy for the ethanol industry which distorts grain and food markets whilst removing large potential revenues for the Federal Government.

⁹ ^ <http://ies.jrc.ec.europa.eu/wtw.html> Concawe Well to Wheels I.C.A.

They represent another form of 'infant industry' type assistance which has been repeatedly demonstrated over time to be counterproductive as it leads to inefficiency, complacency, moral hazard issues and further rent seeking behaviour into the future.

The justification for excise relief for the ethanol industry has been proven to have little foundation in many reports since it was first introduced.

In addition, the excise arrangements do not provide any preferential treatment for superior advanced and second generation ethanol technologies hence stymieing such investment and commercialisation.

Accordingly, ALFA argues that the current fuel excise arrangements should be discontinued immediately, the Labor/Windsor deal be shelved permanently and that preferential Government treatment be provided for advanced and second generation biofuel technologies.

Appendices

Ethanol produced/ yr/ L

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21
Manildra	300,000,000	300,000,000	300,000,000	300,000,000	300,000,000	300,000,000	300,000,000	300,000,000	300,000,000	300,000,000
Dalby	80,000,000	80,000,000	80,000,000	80,000,000	80,000,000	80,000,000	80,000,000	80,000,000	80,000,000	80,000,000
Sucrogen	60,000,000	60,000,000	100,000,000	100,000,000	100,000,000	100,000,000	100,000,000	100,000,000	100,000,000	100,000,000
Total	440,000,000	440,000,000	480,000,000	480,000,000	480,000,000	480,000,000	480,000,000	480,000,000	480,000,000	480,000,000

Benefit to Manildra from new Labor/ Windsor deal

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	Total fuel saving
3,750,000	7,500,000	11,250,000	15,000,000	18,750,000	15,000,000	11,250,000	7,500,000	3,750,000	-	-	93,750,000

Total fuel excise revenue lost to Federal Government

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	Total lost excise revenue
Excise – budget (a)	2.5	5	7.5	10	12.5	12.5	12.5	12.5	12.5	12.5	
Excise-Windsor deal (b)	1.25	2.5	3.75	5	6.25	7.5	8.75	10	11.25	12.5	
Excise saving (a)	22.5	20	17.5	15	12.5	12.5	12.5	12.5	12.5	12.5	
Excise saving (b)	23.75	22.5	21.25	20	18.75	17.5	16.25	15	13.75	12.5	
Lost excise revenue (a)	99,000,000	88,000,000	84,000,000	72,000,000	60,000,000	60,000,000	60,000,000	60,000,000	60,000,000	60,000,000	703,000,000
Lost excise revenue (b)	104,500,000	99,000,000	102,000,000	96,000,000	90,000,000	84,000,000	78,000,000	72,000,000	66,000,000	60,000,000	851,500,000
Additional lost revenue	5,500,000	11,000,000	18,000,000	24,000,000	30,000,000	24,000,000	18,000,000	12,000,000	6,000,000	-	148,500,000