

Senate Select Committee on the Socio-Economic Consequences of the National  
Competition Policy

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Productivity Commission Inquiry

into the

Impact of Competition Policy Reforms on Rural and Regional Australia

Submission

from the

NSW Grains Board

October 1998

Executive Summary

NSWGB provides market power to NSW grain growers by allowing the to 'act collectively' to maximise returns through providing marketing services and countervailing power against an increasingly concentrated supply chain

The additional revenue derived for producers through these arrangements are critical to maintaining the viability and long term sustainability of rural and regional Australia.

NSWGB supports this Inquiry as it believes the current NCP approach will have adverse impacts on the rural community through not adequately balancing social and equity considerations with theoretical economic efficiency. The NCC process, in its current form, does not allow for a fair or equitable assessment of the community public benefit NSWGB recognises the need for ongoing and rigorous review of legislation which advantages a sector of the community, but such reviews need to have clear and consistent guidelines for both the parties subject to the legislation and those proposing its removal It needs to be recognised that the review process requires significant time and financial resources and that, to date, this has been primarily the responsibility of the industry to provide given the need for the industry to prove its 'innocence'. This cost is exacerbated by the lack of clarity in regard to the NCP process and the approach to measuring and

weighting community costs and benefits

The NSWGB is also concerned about the NCC approach to transitional arrangements, in particular, the period allowed for transition. If this is not sufficient, the industry will not be able to develop alternative structures that are competitive in a deregulated market and producers will lose the bargaining power they have built up over many years through collective action

There are a number of issues relating to the grains industry which the NCC process has not provided fair assessment of or due recognition of in our view. These are:

The fact that the grains industry operates in a corrupted world market and the impacts of this environment on both the industry now and in event of deregulation within this 'imperfectly competitive' market

The issues surrounding single desk arrangements, in particular, the ability to extract additional revenues and the efficiency or inefficiency of such arrangements

The size of business globally and the need for Australia's rural sector to be of sufficient size to compete effectively and as a flow on the mechanisms required to balance large globally competitive business with equity considerations within our small domestic market

The role that the industry's marketing arrangements have played in ensuring growers have the capacity and confidence to invest in new technologies and ongoing productivity improvements to maintain their competitiveness and the importance of the ongoing ability for such investment

The structure of industry throughout the entire supply chain from domestic or overseas consumer to growers and balancing of equity between parties in the supply chain. The barley (with a similar situation for canola) industry is characterised by high levels of concentration at the maltster, brewer and retail levels as well as a high degree of integration between the malting and brewing sectors, but with a large number of small producers. Within such a structure, there is little likelihood of consumers or producers capturing any benefit from deregulation, rather the gains will be shared amongst the processor and retailer sectors

The importance of maintaining a focus on sustainable farming practices and environmental management in order to ensure the long term future of the industry. The NSW grains industry has a good track record in terms of environmental management, however, there is a range of major environmental threats on the horizon. It is critical to the ongoing sustainability of rural communities and industries that farmers have sufficient funds and confidence in their industry to maintain investment in sustainable farming practices. The NCC requires a mechanism for adequate consideration and weighting of these factors

In summary, the NSWGB welcomes this review as it believes that rural and regional communities are under threat from the NCC process unless a fair and equitable assessment of economic, social, equity and environmental issues can be incorporated into the process. To date, the NSWGB believes the focus has been on economic efficiency at the expense of these other factors. This is largely due to the presumption that competition will provide a better community outcome and the lack of clarity and guidance in relation to application of the competition policy agreement. It is critical that these issues are addressed as a matter of urgency if the fabric and vibrancy of rural Australia is to be maintained

## Introduction

The NSW Grains Board is a statutory marketing body representing the NSW grain growers and was formed out of the merger of the Oilseeds, Sorghum, Barley and Oats Marketing Boards in 1991, providing improved efficiency and service for growers.

The NSWGB provides market power to NSW grain growers through enabling them to 'act collectively' in an attempt to maximise returns by jointly providing marketing services and countervailing power against a concentrated end user sector and large multinational grain trading companies. In effect, the NSWGB is a producer oligopolist. It is not a middleman, but acts as a principal for growers, with profits earned from sales by the NSWGB being returned directly to producers.

The NSWGB believes this Inquiry is important as it has concerns over the National Competition Policy (NCP) process and identification of public interest with respect to the Competition Policy Agreement (CPA). This Review of the Impacts of Competition Policy on Rural and Regional Australia purports to have been initiated to ensure that potential benefits of increased competition in the economy flows to all Australians. Potential benefits have been identified in areas of economic efficiency, economic growth and community welfare.

A review of this nature is appropriate as, in the view of the NSWGB, the NCP process, in its current form does not provide a sufficient process to enable fair and equitable assessment of the costs and benefits of existing industry arrangements. Nor does it adequately address transitional issues.

The NSWGB recognises the need for legislation affecting the industry to be accountable and therefore reviewed in a way that is rigorous and quantifiable. However, it does not believe that the NCP has yet developed a consistent process for assessment of such legislation. As such, there is a need to clearly define the community (public) interest in the context of the NCP process and to improve the clarity of the process that is undertaken by the NCC in assessing the compliance of State and Federal Government legislation.

The NSW grains industry has been directly impacted by the NCP process through the review of its single desk\* marketing arrangements. This is not only through any potential changes that may be recommended to the industry structure (the NSW review is currently in progress and not yet complete), but through absorbing substantial managerial and financial resources of both the NSW Grains Board and the farmer bodies.

\* Note - Arrangements are referred to as 'single desk' but due to the State based nature of arrangements, there are in fact 4 single desks for barley and 2 for canola plus competition from private traders

Whilst the NSW Review is still in progress, the reviews of similar regulations for barley in South Australia and Victoria have recommended the immediate removal of domestic regulations for malting barley and possible removal of export regulation for feed and malt barley by 2000. The NSWGB does not believe that the process undertaken in these States proved conclusively that there was a net community benefit from deregulation. Nor did the review process adequately assess alternative models or regulations for the industry to both assist it through the transitional phase and ensure its profitability post deregulation. The NSWGB believes this typifies its concerns about the NCP where the sectors supporting regulation need to prove all claims conclusively, whilst the supporters of

deregulation are presumed to be right even though they cannot fully substantiate this.

The issues that this submission addresses are:

NCP process and framework

Transition arrangements

Supply chain equity considerations

Environmental and sustainable practices

Prior to discussion of these issues, an overview of the NSW grains industry is provided with some of the specific issues relating to competition in this sector highlighted.

In providing this submission, the NSWGB has not attempted to provide comprehensive assessment of the issues relating to the grains industry specifically but rather to raise issues of concern with the NCP process and possible impacts on individual sectors such as the rural community.

NSW Grains Industry

The NSW grains industry has an established record of a successful export industry. The grains industry forms a major part of the NSW economy, as does the grains industry nationally.

This year NSW will produce approximately 3.6 million tonnes of coarse grains and oilseeds valued at around \$385 million. This is up from 2.5 million tonnes five years ago. Growth in production has been due to both area and yield improvements. Approximately 28% of all NSW coarse grain production is exported by the NSWGB each year and the percentage has been increasing each year since the Board was established in 1991. Canola exports are expected to exceed 300,000 tonnes this year (1998/99), up from virtually zero five years ago.

A major feature of the international barley market is that marketing boards (e.g. in Australia and Canada) sell into a market in competition with multinational grain companies. Their behavior is influenced by state trading entities including the EU Cereals Management Committee and the US Commodity Credit Corporation. Approximately one half of the barley trade is dominated by single desk sellers.

Much of the confusion in the present barley marketing debate is based upon the lack of clear distinction between additional revenues earned by a single desk seller and the total efficiency or inefficiency of a single desk seller versus multiple sellers. That is, it is theoretically possible for the Board to earn price premiums and still have a situation in which producers could be worse off than they would under multiple sellers. However, this situation could only occur if the single desk system resulted in higher costs. To date, there has been little quantification of those purporting the inefficiency of the single desk vis a vis a competitive situation. Our own informal benchmarking indicates that our operating costs are equal to or lower than those in the private sector with similar size businesses. Continual changes to the pooling arrangements (see later comment) have assisted to reduce potential resource allocation impacts.

The ability of a single desk seller to generate additional revenue through price discrimination is well founded in economic theory. There is general agreement that the single desk is able to price discriminate. However, other reasons the Board may be able to increase revenues are that the supply guarantee allows them to spread risk. That is, if the Board did not exist, there would be higher variability in quantity, quality and price and lower confidence levels existing among producers to produce new and existing crops.

Australia is a major player in the world barley market. It is among the top three exporters of both feed and malting barley in the world and the second largest canola exporter. At times, total exports of barley from the EU, Canada and Australia have been in excess of 78% of total world barley exports. Canada and Australia together have had more than 50% market share of barley exports. For malting barley, Australia's market share has exceeded 50% of a 3-3.5 million tonne market. The NSWGB has shared up to 550,000 tonnes of this market, with around 30% of the single biggest malt barley market, China.

#### The Grains Industry Operates in a 'Corrupted' World Market

The grains industry operates in a world market affected by the social and economic policies of exporters and importers who are protecting their domestic industries.

On the import side, in Japan the Japanese Food Agency is the sole importer of barley providing tenders or 'quotas' to each supplier.

On the export market, Australian growers face many forms of market failure e.g. US and EU grain is produced and/or placed on world markets below the cost of production due to a range of government payments and subsidies to their producers and traders.

Export Enhancement Program (EEP) subsidies and restitution payments have been central to the export of US and EU barley, respectively. For barley, these subsidies commonly exceeded US\$60/tonne and, in 1998, barley sold out of the EU saw restitutions as high as US\$75/tonne.

The EU halted restitution payments in 1995, but reintroduced them in September 1996. Similarly, the US has not subsidised barley exports since July 1995. However, the 1996 Farm Bill authorised EEP funding of some US\$350 million in 1999, \$579 million in 2000 and \$478 million in 2001 and 2002. As recently as July 1998, USDA announced a new EEP package of 16.2 MMT of wheat and 1.5 MMT of malting barley for 1998/99.

In the NSWGB view, the NCP process and statements by the NCC have shown little recognition or regard for the global environment in which Australia's rural industries, in particular the grains industry, operates. Nor does it take into consideration likely impacts from world trade reform in the medium to long term.

In essence, the focus is short term and does not take into account the ongoing dynamics of the industry post deregulation.

The grains industry recognises that world trade reform is a long term prospect, however, the NSWGB does not believe that the current level of support provided through the single desk arrangement is a burden on the community and therefore there is not good justification for removing it. The NCC view appears to be that if world trade reform is a long term prospect, then industry arrangements should be removed to let resources flow to more productive areas. The NSWGB does not believe that the current arrangements result in misuse of resources, limit producer efforts to reduce costs or cause producers to be less responsive to user demands. The grains industry is a global industry and thus, grower decisions are influenced by the world market place. There are not easily identifiable or viable alternatives to broad acre cropping across the grain growing regions. Also if the US and EU are genuine about removing subsidised production of export

surpluses, and allowing their producers are efficient enough to grow grain for export without subsidised, then the Australian industry should be well placed as it previously competes with subsidised sales and services.

It is also important to recognise that if the NSWGB is to be competitive in global markets, it needs to be of sufficient size and power to the other players i.e. the global markets are characterised by big business. In the absence of collective action taken by producers, overseas owned multinationals will dominate the grains industry.

Technological advances and productivity improvements have allowed NSW grain growers to remain competitive. The ability to keep on investing in such technology and practices is dependent on farmers continuing to make reasonable profits – profits which are currently delivered through the market power provided by the single desk. If returns were reduced, the industry would be forced to take an even more ‘low cost/low investment’ approach to farming and may not provide sufficient capacity to maintain productivity improvements or may be forced into less sustainable agricultural practices to survive.

In response to the global marketplace, the (NSW) industry has continually changed and refined its structures and practices to ensure efficiency is increased. This has included: Cost pooling has been replaced by disaggregation of costs to an individual farmer basis where possible

Revenue pooling remains but has been disaggregated by quality specifications leading to increased number of pools reflecting end user customer requirements and price differentials are for categories of pools based on quality differences

Increased market options for growers including cash options, contracts and pools

Downstream investment on behalf of growers to obtain greater control through the supply chain

#### Future Issues and Directions

The long term focus of the NSWGB is to have an industry that can ensure the fabric and existence of the rural community is sustained. This focus incorporates environmental, economic and social issues.

The Board’s targeted outcomes include:

Continued confidence by investors, growers and end users

Retention of critical mass in order to effectively compete with outside competitors and whilst corruption on world markets continues

Grower ownership of their organisation

Establishment of the least cost path between farm and end user via coordination and cooperation

Continued development of market confidence in stable, quality supplies of product

Reduction in the need for farmers to exploit their environment so that more sustainable practices are employed

Retention of market power for growers and improved profitability is also critical to the future development of the industry. Two major issues the grains industry faces in the medium term are biotechnology and world trade negotiations.

In regard to the former, it will be critical that growers have the opportunity and the mechanisms to enable investment in arrangements governing the introduction to biotechnology to ensure access to this and provide an opportunity to share in increased margins that may result from the application of this technology. This will obviously

involve investment beyond the resources of individual growers.

In regard to the latter, it has been indicated earlier that freeing up of world trade will have significant benefit for Australian growers. It is essential the industry be in the position to take advantage of these outcomes when they occur. This will require investment in assets, technology and farming practices throughout the period leading to a 'free trade' scenario.

#### NCP Issues for the Grains Industry

There are a number of issues in relation to the NCP agreement and process that the NSWGB has concerns about. These include:

The NCP framework and process

Transition arrangements

Supply chain equity considerations

Environmental/sustainable farming practices

#### NCP Framework and Process

As previously highlighted, the framework that has been put in place at State and Federal levels to give effect to NCP Legislative Reviews has been driven by the presumption that industries allegedly "protected" by anti-competitive regulation must prove a strong case in terms of net public benefit or else the regulations will be removed.

This presumptive stance has been conferred to the state agencies that are charged with implementation of competition policy. However, there has been little guidance provided on terms of the definition of community interest or the process of measuring costs and benefits. The experience of the NSWGB, and that of our counterparts in other states, is that it has rested primarily with the industry (i.e. the Marketing Board's and farmer groups) to develop and fund the techniques and research to measure costs and benefits. As such, the NSWGB is required to prove its "innocence", and must fund its own defence. The NSWGB has invested substantial resources in the time of its management and funds in its participation in the NCP process, with similar experiences in other states. Other industries such as sugar, rice and dairy have also been required to each invest substantial time of their industry leaders and funds to justify their arrangements.

The terms of reference according to which legislative NCP reviews are undertaken are brief and worded in general and generic terms. This relates to both the economic benefits as well as the other issues listed in Section 1(3) of the CPA i.e. social and equity issues.

The NSWGB is concerned at the lack of clarity as to how those terms of reference can be interpreted, and the amount of subjectivity that exists as to their meaning.

The NCC itself has stated that:

this list is not exclusive or prescriptive;

the weightings that might be applied to these factors must vary from case to case; and

the subsection provides a tool to assist rather than provide a blanket mechanism.

Yet in public statements made by the Chairman of the NCC and the Treasurer, and in the attitude that has been demonstrated by the NCC in responding to outcomes of certain reviews in the agricultural sector, it would appear that very little regard is given by the NCC towards any of the items in 1(3) other than the "efficient allocation of resources" and lower prices for consumers.

In practice, these factors are most easily reduced to financial or economic quantification in the levels of prices and incomes and resource allocation that may result from intervention and/or its removal.

There is little evidence from our experience of the process, and observation of the review of barley legislation in South Australia and Victoria, of effective guidance emanating from the NCC to assist the states to take account of the full range of factors included in the public benefit or apply appropriate weightings.

NCP theoretically allows Governments to pursue social and regional development policies through anti-competitive legislative instruments. Whilst it has been indicated that, within the competition policy framework, Governments can continue to pursue these objectives if they wish (providing less restrictive way of achieving the outcome are investigated), it does not appear to be supported by the NCC in practice. The threat of penalties through the payments to States appear to have been used to ensure State Governments pursue outcomes supported by the NCC.

As outlined earlier in this submission, the grains industry has undergone considerable change during the past decade in terms of its structures and strategies. It has invested considerable funds in developing national strategies for the key sectors (through the GCA Strategic Planning Unit process) and has continued to introduce innovations to address issues of efficiency and profitability at the market and production levels. This has, and continues to, require cooperation of state governments.

The NSWGB believes the NCP process could dismantle that co-operation through a fast-track timetable and a strict adherence to goals of economic efficiency and achieving open competition (at any cost) along the supply chain. Perhaps the key fear is the loss of confidence amongst farmers which would quickly arise from increased volatility in prices and uncertainty about buyers for their products. This could easily lead to production downturns and loss of key markets. This would spill over into rural communities creating further declines in their confidence and survival.

#### Transition Arrangements

The issue of transitional arrangements is of particular importance to the grains industry. The NSWGB's believes a sufficient transition period (in the event of needing to adjust to a totally deregulated grains industry) is essential to provide:

the ability to enable adequate time and incentive for alternative structures to be put in place that will be effective in a free market and provide equitable treatment to grain growers against the significant bargaining power of downstream sectors who have been allowed to aggregate and increase their control of the supply chain. One of the requirements of the NSWGB in being able to compete in a deregulated market is a sufficient capital base which will need to be obtained through build up of capital reserves (minimum five years);

equitable treatment to grain growers against the uneven playing field in the world market consistency in changing regulations that are state based

The NSWGB has concerns as to the apparent resistance of the NCC towards reasonable transition periods to allow industries to adjust to change, where regulatory reform is required. The NSWGB understands that it is the NCC's objective, not only to ensure that the formal review processes are undertaken by the year 2001, but that any changes to regulations – including transition periods – have been fully implemented by that time. As indicated above, in the case of the NSWGB, this would be insufficient time to enable it to create the capital base and structure it would require for a deregulated market.

The NCP process has, in the view of the NSWGB, focused only on the narrow view of



competitiveness i.e. competition at points along the supply chain between the farmers and first consumers of grains (e.g. maltsters and stockfeed companies), and the competition between farmers to access certain markets on the basis of price, location and product quality.

The NSWGB's concern is that this process overlooks the long-term competitiveness of the industry in the world markets, at both farm and processor level.

It also overlooks the need to ensure that it is end product consumers who see any gains, rather than the processor or middleman with greatest market power syphoning off all the gains (e.g. the egg industry).

#### Equity Considerations

The process of marketing grains and oilseeds from a wide geographical area of supply and a large number of small suppliers relative to small number of large customers and/or very remote customers tends to be costly, ineffective and inefficient unless there is a process of bulking to achieve economies of scale in storage, transport and supply to customers.

In the case of malting barley where only two major end users exist, and where malting barley tends to be more of a product than a commodity, and suppliers and customers tend to find great difficulty in achieving their marketing and accumulation objectives, provisions exist to apply discipline to the marketing function. For example, there are about 4-7,000 growers and two end users. Furthermore, these two do not compete with each other in all regions as one is in the State's North and the other in the South.

No doubt the multi-national traders would contend that with their entry into the market, there would be added competition. However, this argument lacks merit as these traders would still be limited to the same small number of processors as customers, and therefore, would not provide a real increase in competition on the demand side.

Further, each maltster is exclusively linked to one of the only two major brewers in the country. Thus a duopoly exists which exercises power over the raw material suppliers. Canola is a similar situation to malting barley where end user market dominance occurs with one participant controlling oilseed crushing capacity for some 90%+ of all canola crushing in Australia and where only one other regional competitor with capacity of over 10,000 tonnes exists.

Australia's role in the international grain market (particularly barley and canola) is significant, yet our domestic market is very small by comparison to other exporting countries. It is essential and commercially sound that, for global competitiveness, the aggregation of the commodity marketers and food processors/retailers is possible. Without this, their ability to compete on the world market will be diminished. This is especially the case given the relative size of the US and European companies that dominate the grain markets.

To date, the NCP process appears focused on a narrow analysis of the industry in the segment of the chain between farmgate and first processors of grain. This will not provide an outcome leading to a globally competitive industry.

Statements by the Treasurer and NCC, and subsequent analyses presented to the industry in the recent reviews, propose policy change on the justification that competition will see the consumer much better off. However, with the inequitable market structures that exist

(as illustrated by the above numbers) such benefits are unlikely to result unless there is some balancing of bargaining power along the supply chain.

Economic efficiency will only be delivered if there is strong competition along every stage of the supply chain. If one stage features imperfect competition, this can, and will, lead to price distortions that can affect the entire product chain through to the consumer. This is important in the grains industry with imperfect competition on both domestic and export markets.

High concentration in the processing (malting, brewing, crushing) and retail sectors and the little correlation between grain prices and end product prices limit the opportunity for consumers to benefit from the removal of intervention. Similarly, large numbers of producers, located in regional areas, have little or no bargaining power to resist these forces.

In essence, it is the NSWGB's view that the NCP process of dismantling structures in the grain industry pays little regard to the loss of equity in negotiating structures, in the pursuit of purported economic efficiency.

#### Environmental/Sustainable Practices

The grains industry is cognisant of the effects of the industry – at farm level – on the environment, and has long adopted a very responsible approach to the industry management of such risks and safeguards. The Australian grains industry is highly aware of its fragile environment and has become a world leader in sustainable agricultural systems. Without doubt this has added to costs of grain production. However, it is also evident that if returns to producers are cut, this will lead to cutting of costs, in particular, those that are not directly contributing to profit.

The NCP process appears to have little regard to these issues– as evidenced by the absence of consideration of these issues in the SA/Victorian review. Yet the grains industry faces a number of major environmental threats including:

Salinity – one estimate suggests that 4.4 million hectares of land is affected at a cost estimated at over \$100 million a year

Acidity – a problem where mixed grazing and cropping practices have been undertaken and is typically associated with heavy fertilizers and long term use of 'improved pastures'. Ultimately, a new cropping and pasture rotation must be introduced so that there is much more careful arrangement of nitrogen in soil

Erosion by Water and Wind – soil erosion has long been regarded as a major problem in Australia and was the land degradation problem that prompted the establishment of extension agencies to promote better environmental management practices

If grower's incomes are eroded from removal of the single desk arrangements, then the potential investment in time and dollars in these non-productive areas will also be eroded. The NSWGB believes that within this scenario farmers will be driven to pushing resources to limits as farmers make their own short-term decisions on means by which they can operate viably.

This is likely to see

fewer but larger farms

increased use of inputs to maximise productivity

increased demands on limited water resources to improve productivity

less attention to sustainable farming practices

When environmental degradation occurs, traders can, because of international sourcing simply move to another location for their produce.  
By becoming increasingly subordinate to financial capital, farmers will have little room to alter production regimes. This will limit the choice of crop rotations and alternative commodities available to the farmer. Growers will be forced to farm more intensively  
As stated earlier, the NCP process at a national level appears to be driven solely by regard to economic efficiency and international competitiveness. This Inquiry must explore the long term effects of the industry that emerges in the absence of regulation, with respect to these issues and in the view of the corrupted world market. In particular, the long term impacts on rural communities.

## NSW Grains Board Submission to the Productivity Commission

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