

Dear Sir/Madame

We were a bit confused as to the d-date for comments: Page 4 states Monday 6 November 2019. Sorry for being late (if at all).

Grain SA represents grain farmers in South Africa. We are net exporters of maize, our biggest commodity. We also have an interest in the value chain comes times of drought and big imports.

We regard the TNPA rates (cargo dues) for maize and wheat (imports and exports) as reasonable. We do not have any further comments on the setting of the tariffs.

Grain SA, however has some other concerns:

- It is our understanding that the PPP between Government (TNPA) and Afgri is not been finalised. This gives some port elevators a huge power base almost a **monopoly**. Should we have a great crop year or a drought, it would put SA in a predicament. We could even run into food shortages.
- We are also concerned that the **rent period** for those operating the terminals for grains is not conducive enough to **invest** in better equipment to keep SA competitive in exports and imports. During the last big drought (2016), we hardly made it to get enough food into the country. **This is a national security risk**. Periods like 30 or 40+ years could assist in them investing more and recover over a longer period. Everybody wins!
- The **deepening** of the grain elevators (SABT and RBT) is very critical for future food security for SA. Smaller ships is more expensive per ton and also takes longer to turn around when we have big import or export programs. Climate change dictates that we will probably continue to import and export grains all the time.

Thanks for the opportunity to comment. Please feel free to make contact with us if you need more clarity.

Regards



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