

10<sup>th</sup> June 2011



Mr Jeremy Threlfall  
Assistant Director Access  
Economic Regulation Authority  
PO Box 8469  
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By email: [publicsubmissions@erawa.com.au](mailto:publicsubmissions@erawa.com.au)

Dear Mr Trelfall

**Issues Paper: Review of the Requirements for Railway Owners to Submit Floor and Ceiling Costs Proposals**

The Association of Mining and Exploration Companies (AMEC) is the peak national representative body for hundreds of mineral exploration and mining companies within Australia, many of which are based or have projects in Western Australia.

AMEC's strategic objective is to secure an environment that fosters mineral exploration and mining in Australia in a commercially, politically, socially and environmentally responsible manner.

It is in this context that AMEC provides the following comments on the Issues Paper.

AMEC is a strong advocate of third party access to infrastructure, such as private rail networks.

In this regard, many AMEC members are small and emerging miners who have a direct interest in developing business cases and financial models in order to determine project feasibility; and subsequently raise equity and debt finance for the project.

It is therefore an essential requirement, for clarity and certainty in the decision making processes, that railway owners continue to make publicly available 'floor and ceiling cost proposals'. Such an approach will also ensure that competition on relevant rail networks is transparent and fair.

Thank you for the opportunity to provide comment. If you wish to discuss this matter further please feel free to contact Graham Short or myself.

Yours sincerely

Simon Bennison  
**Chief Executive Officer**

**Association of Mining and Exploration Companies (Inc)**

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