

NSW
27 March 2002

Citrus Industry Inquiry
Productivity Commission
LB2 Collins St, East PO
Melbourne Vic 8003

Dear Commissioner,

Introduction

This is a second submission to the Productivity Commission's Citrus Industry Inquiry and follows the presentation made at the Public Meeting held at Griffith on 11 March 2002.

It presents additional information on the situation which currently prevails in the export of Australian citrus, particularly lemons, to the United States. The writer holds the view that the current practice of marketing all citrus product through a single desk importer significantly limits the potential of the citrus industry in Australia. The writer delayed the presentation of this submission as he was awaiting information from Horticulture Australia Ltd (HAL), requested on 18 February 2002. At the time of writing, HAL had not replied to the request for market information.

The submission is composed of two parts. The first part comprises general comments about broadening the single desk marketing system. The second part is an analysis of marketing information provided by HAL and highlights several inconsistencies associated with the quality of and the prices received for Australian lemons in the US and the management of the Corporate Permission.

Background

My background includes a fifteen year period (1975-90) in which I managed a 20 hectare orchard in the Hawkesbury district of NSW, with 10,000 citrus trees, 8,000 of which were lemon trees. The annual production of the orchard was of the order of 30,000 cartons sent to Sydney and Interstate markets and 150 tonnes to juice factories. I was a major supplier of lemons to the Sydney Fresh Fruit Market. In addition, I bought and marketed fruit from other orchards. I have qualifications in agriculture, BScAgr (Syd) and business, MBA (UWS).

Part 1 - Expanding the Single Desk Market in the US.

- 1.1 The citrus industry is made up of a number of product segments, with distinct markets for navel oranges, valencia oranges, lemons, mandarins and so-on. Each of these markets has to be considered as a different product, as each type of citrus is considered by the market place as a different product with different uses and appeal. DNE's success

in the US is built on the navel orange industry, a very specific portion of the market. Comments I made at the public meeting at Griffith were about building on the success and image the navel orange industry has achieved through the import broker, DNE. With other importers involved, all of the citrus industry, including the navel orange segment, would be better able to manage its business, as it would be able to set benchmarks, compare performances and develop greater market penetration. None of this expansion has to be to the detriment of what is currently in place with DNE who are predominantly only interested in navel oranges.

- 1.2 DNE might want a monopoly situation to prevail and might argue that it cannot perform in any other environment other than a monopoly. Australian citrus industry representatives simply put it to DNE that Australians growers are taking up the opportunity to maximise the sales opportunities in the US and that a reciprocal quid pro quo monopolistic relationship does not operate when it comes to DNE marketing only Australian citrus.
- 1.3 Australian Citrus Grower Inc (ACG) argue that more than one importer into the US will create a cycle of price cutting, with the overall effect that growers will receive less for their fruit. However, such a position discounts the industry's ability to review performance of all importers to determine which is the best. Currently ACG say they are arbitrarily picking winners for everybody. Commercial reality tells us that every supplier will only want to support the importer who gets the most for their fruit. Price undercutting can only be a short lived exercise as the underselling importer will soon run out of quality fruit supplies. Managing this at industry level, monitoring the market prices and quantity, coupled with accurate market information feedback to growers, packers and exporters would soon sort out the market from the suppliers perspective.

(When I was selling lemons in the wholesale markets in Sydney, Brisbane and Melbourne, I was using a number of agents. The one getting the best price got the best of my fruit and the quantity they sought, the one getting not so good prices only ever got the overrun. Competition in my situation along with continuous contact with the agent helped me achieve good prices.)

- 1.4 I understand that the DNE Corporate Permission will undergo a rigorous review in 2010, ten years following the incorporation of HAL, and eighteen years from the original establishment of the Corporate Permission in 1992. This seems to be a very long period. If other importers are introduced, the Corporate Permission approvals could be installed over shorter time periods, include appropriate extension clauses subject to satisfactory compliance with the performance criteria.
- 1.5 I believe there is a case for other selected organisations to import navels into the USA

while the market is so good and thus maximise Australian citrus potential in this market.

- 1.6 The situation with lemons, however, is very different. DNE are not interested in Australian lemons. They are not importing any real quantities of lemons from Australia and they are making a big noise in the US press about Argentine lemons as this is what they want to develop. For example, in the recent Produce News' article entitled, "*From its beginnings in 1914, DNE looks to the future*" (4 Feb 2002)¹, DNE talk extensively about their supply of Argentine lemons into the US and only make a mere mention of lemons from Australia.

The Corporate Permission as it currently stands is of great advantage to DNE as it is cutting out a potential lemon supply competitor to DNE in the US, ie the Australian growers. How? DNE know the Corporate Permission excludes any other importer bringing in Australian lemons and therefore the Corporate Permission officially excludes a competitor; DNE are "sitting sweet". The Corporate Permission from the Australian lemon grower's point of view is a massive obstacle. Is this what ACG and the Australian Government want?

- 1.7 Furthermore, I understand the situation to be similar with mandarins and clementines. It seems that DNE's preferred source of these fruits in the contra-season is not Australia, so why should the Corporate Permission give DNE the opportunity to lock out Australian suppliers in the US market?
- 1.8 There are numerous good reasons to encourage US importers who want to concentrate on developing the market for the various lines of citrus product. Marketing practitioners continually tell us about the need to segment your market. Each product line and importer can be established with a set of performance criteria so that we, in Australia, are seen to be managing our products, not a single US entity telling us what we can do and what we can't. If they don't want our products then we should be free to look for alternative alliances. The trouble is that the blockage is at the Australian end and within the ACG and HAL. Perhaps new, fresh professional management and marketing talent, not bogged down in the machinations of the citrus industry could make a difference.
- 1.9 A request for a change to the Corporate Permission enabling the export of lemons to the US this year was made to ACG, with a copy to HAL, on 13 February 2002 (no reply) and again on 23 February 2002. In reply to the second request ACG requested a cost benefit analysis supporting the export of Australian lemons to the US before they would consider any change to the Corporate Permission. Such a response is astounding.
- First, there were no lemons going to the US in 2001, and consequently, selling just

¹ www.producenews.com/FramesNews.cfm

one case for \$20 means that an Australian lemon grower could have been \$20 better off.

- Second, it is an anomalous situation when it is necessary for us in Australia to justify to a voluntary industry organisation (ACG) to undertake international trade and gain their formal approval.

- 1.10 What other industries have carte-blanche to manipulate their commercial environment like this? ACG and HAL are stonewalling. Enough effort is required to co-ordinate the trade and keep the buyers on side; playing this stonewalling game is futile and counter productive and is keeping product off the market.
- 1.11 In my case, the change to the Corporate Plan would have to occur now in order to coordinate the supply and delivery process in 2002, and also to keep the US buyer on side. I suspect the opportunity may be already lost.

Part 2 - Market Reporting by Horticulture Australia Limited

- 2.1 HAL's website describes them as having established "*a national and global market intelligence and research network to provide a source of reliable information including market forecast and profiles*". Their market appraisal for lemons in the US, however, leaves a lot to be desired. The data they gave me on 12 and 13 February 2002, (following a request for information on 14 December 2001 and a reminder in late January, 2002) could hardly be described as reliable or competent. It was not referenced and provided in such a way to lead the reader to believe that there is absolutely no market for contra-season lemons in the US. This is simply just not true. For example, citing the release of 1.5 to 2 million cartons of stored Californian lemons onto the market is hardly precise - this is a 33% variation. This initial response from HAL led me to subsequently ask them on 27 February 2002 to clarify the market situation they presented for lemons in the US. At the time of writing this submission no reply has been received from HAL; 9 weeks has passed since my inquiry.

It is best that the Productivity Commission judge for itself the value of the market intelligence provided to me by HAL. Below I have quoted, unabridged, the information supplied by HAL (in italics), and provided my understanding of the market through my referenced research.

2.2 The first question sought information on the quantities and prices for lemons exported to the US.

- 2.21 HAL: "*There were no lemon exports undertaken in 2001 due to the intense*

competition from Argentina and Chile with wholesale prices of US\$6 being reported and conservative CIF prices of US\$5.84 to US\$9.62 being recorded."
(unsourced)

These are indeed very low prices and would only lead one to believe that Australians would be crazy to export lemons into US. However, what is being reported to me here by HAL questions the integrity of the importing American merchant's knowledge of the market. The merchant² was seeking large quantities of lemons last year and continues to do so this year. The merchant quoted minimum prices for grade 1 lemons comprising sizes ranging from 95's through to 235's of US\$18 to US\$22 per carton wholesale, and more, over the period June to the end of October. In addition, I independently assessed market prices in the US. At the Los Angeles Terminal, lemon prices (figure 2) last year exceeded the merchant's price estimates and far exceeded the prices provided by HAL above.

2.22 HAL: *"According to trade sources, Argentina exported over 1 million cartons into the market with 1.5-2 million cartons of Californian lemons also being released from storage at this time."* (unsourced)

In the 2001 season, according to USDA³, Feb 20, 2002, lemon shipments in the USA comprised 974,000 cartons (40lbs ea) from Argentina, 298,000 cartons from Chile and 2,054,000 from California. (see figure 1). That is, when the total shipping of Californian lemons for the year was 2,054,000 cartons, I am being told that 1.5 to 2 million went into storage. 73 % to 97% of total Californian lemon shipments last year were from storage. What actually happened?

Unfortunately, these statistics widely differ from those obtained from *Statistics at a Glance, Fruit and Nut Highlights*, USDA, October 16, 2001⁴ which reports a total lemon production (including juice?) of 52.6 million cases. HAL is the professional organisation collecting market intelligence. Does HAL know the real situation, and how can the Australian Industry make decisions on data like this?

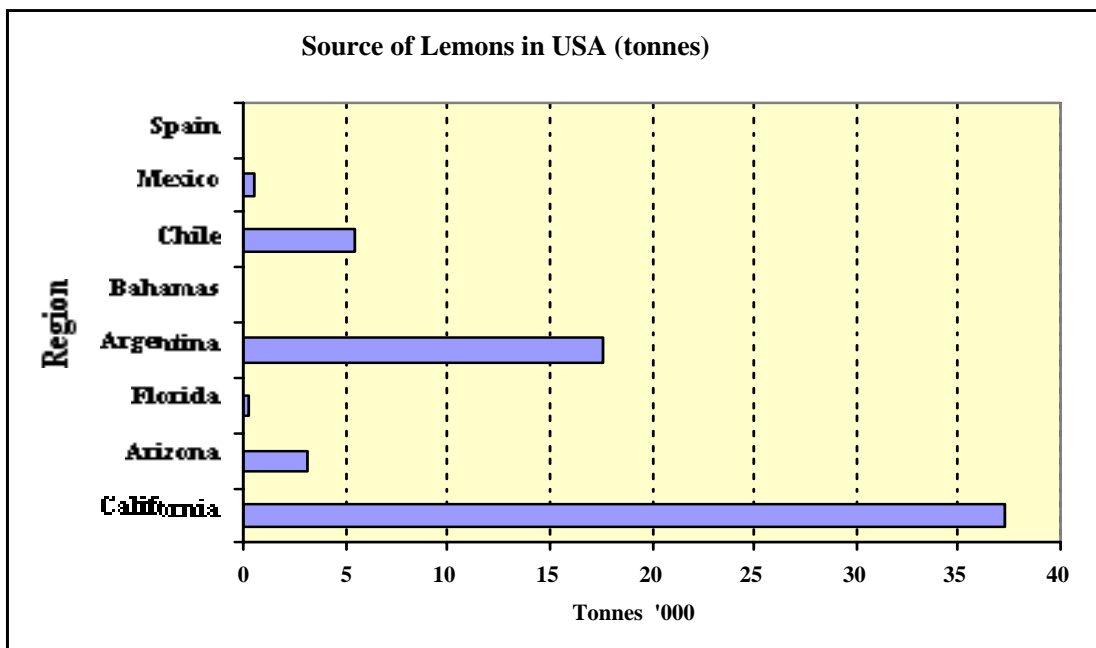
My understanding and past experience is that stored lemons are usually of poor quality. Nearly any lemon sent from Australia would be of better quality. I do understand that the Americans are developing effective storage protocols, but they are not there yet. On checking with the American merchants, their comment was that if there were so many quality lemons about, why would they be seeking them from Australia?

² The name of this company was provided in the submission presented on 4 December 2001

³ www.ams.usda.gov/mnreports/WA_FV427.txt, WA_FV436, Washington, USDA, AMS, Feb 20 2002)

⁴ www.nass.usda.gov/ca/rev/frt&nut/

Figure 1



2.23 HAL: *"It has been widely acknowledged that the quality of Australian lemons has not, on average, met the quality standards to those of our competitors in the market."*

Such a statement is difficult to comprehend given that

- (a) I was asked to source lemons in Australia by a leading American fruit merchant. They have been in the business for more than 35 years and developed a sales history of more than US\$250 million per year to 900 department stores. They wanted up to 200,000 cartons of lemons in 2001. Again they want lemons in 2002.
- They did not want fruit of inferior quality; they were very pleased with the quality of the lemons on display and readily available at Sydney Markets during their visit in September 2001.
 - As purchasers of such large quantities, I would expect that they would know their market. Isolated from the US market, HAL seems to be telling me there is no viable market for Australian lemons and these American wholesalers do not know their market.
 - If US importers are fooled about with any more, who could blame them from seeking an alternative supply.
- (b) No lemons from Australia were sent to the US in 2001. What quality benchmark is HAL using? Fruit quality varies from year to year depending on the season.

Someone wants to keep Australian lemons out of the US market.

2.24 HAL: *"In 1999, approximately 9,800 cartons of lemons was exported with 15,200 cases being shipped in 2000. According to the ABS, 189 tonnes was exported over the 1999/2000 financial year at an FOB value of A\$1.44 per kg."*

"In 2000, when Australia exported approximately 231 tonnes of lemons to the market, the US\$ CIF value was recorded at US\$1.18/kg compared with the major import suppliers outside of NAFTA to the market such as Argentina 7,314 tonnes (US\$0.84/kg) and Chile 6,892 tonnes (US\$0.60/kg). Mexico is also a substantial supplier shipping 164,318 tonnes across the border during 2000. Regarding 2001, Argentina substantially increased their shipments of lemons with imports totalling 17,552 tonnes (US\$0.68/kg) and Chile volumes slightly decreasing to total 6,796 tonnes (US\$0.51/kg).

My interpretation of this information is that

- (1) A carton of fruit in 1999 weighed on average 19.3 kg (189,000 tonnes / 9,800 cartons) or 42 lbs. In 2000 the carton weighed 15.2 kg (231,000/15,200). Why is there such a huge difference? My understanding is that a carton weighs about 18 - 18.5 kg or 40 lbs.
- (2) An FOB price, in 1999, of AUD\$1.44 per kg equates to \$27.79 per carton (19.3kg x \$1.44). An FOB price at this level is excellent for main crop lemons considering freight to US and other charges are still to be added. And yet HAL tells me these lemons were of poor quality and in spite of their poor quality people bought them at this good price.
- (3) A CIF price, in 2000, of US\$1.18 per kg equates to US\$17.94 per carton (15.2kg x US\$1.18). An 18.5 kg carton would be US\$21.83. The 2000 prices are lower than those obtained in 1999, but they are still 40% higher than the Argentine price and 97% higher than that of the Chilean fruit. Even though Australian fruit was "poor" quality, people still purchased it. There is an inconsistency here.

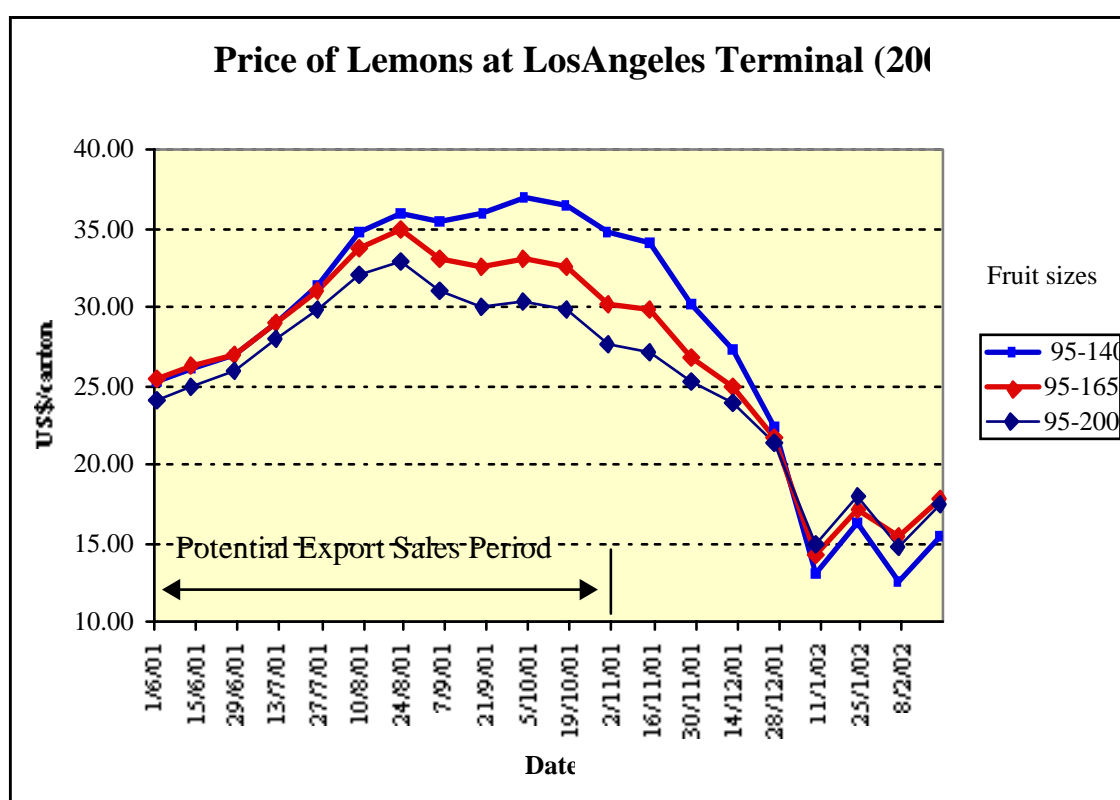
I recall, due to harvesting conditions, the quality of the navel orange crop sent to the US in 2000 was inferior compared to previous years and in 2001, so one might expect a similar harvest associated quality trend might have occurred with lemons resulting in reduced prices.

- (4) In 2001 Argentine and Chilean fruit was 19% and 15% cheaper than in 2000. When I checked the price of lemons on the Los Angeles market on a number of occasions in November 2000, locally grown USA fruit was selling for an average of US\$25. HAL is telling me, using unsourced data, that Argentine and Chilean fruit being sold

for approximately US\$12.24 and US\$9.16 respectively is good quality fruit. It is, at least better than the higher priced Australian fruit, and this is at a time when the market is prepared to pay up to US\$37 (29/11/01) for a carton of its early season fruit. Argentine and Chilean prices do not appear to be shown on the Los Angeles market. Figure 2 shows the movement in average prices for various sizes in the Los Angeles market.

At these prices Australia could have been sending lemons to Los Angeles and doing very well.

Figure 2



Source: www.ams.usda.gov/search/index.htm

- 2.25 In one email (12/2) HAL stated that "Argentina and Chile ...wholesale prices of US\$6 being reported and conservative CIF prices of US\$5.84 to US\$9.62 being recorded" and in another email (13/2) that "Argentina 7,314 tonnes (US\$0.84/kg) and Chile 6,892 tonnes (US\$0.60/kg)". Which is correct \$5.84 to 9.62 or \$15.12 (\$0.84 x 18kg) and \$10.80? It is difficult to conceive how a case of "export" quality lemons can be grown, packed, shipped and commissions paid for US\$5.84. Any market evaluation ought to contain an average, perhaps a median, and a range - not the lowest because who knows what the history and quality of these lemons were. Bearing in mind that an average 18kg carton was selling for US\$15.12 using the price cited above, one would need to ask

what was the history of the US\$5.84 to US\$9.62 lemons?

The lack of a standardised reporting system contained in HAL's reply further adds to the confusion and makes comparisons difficult and unfriendly to interpret. The terms FOB, CIF, AUD, USD, USD/kg and AUD/kg are all legitimate but why does HAL report information one way and then another?

2.26 Until otherwise convinced through independent sources, I have no faith the market information being provided by HAL and could postulate that their source could be DNE itself.

2.3 The second question sought information on how the DNE agreement was reviewed. It is important to evaluate whether or not the maximum market potential is being obtained for all citrus fruits.

2.31 HAL: *"The DNE agreement is reviewed annually by the Australian Citrus Growers Inc. who provides Horticulture Australia with advice at the conclusion of their Annual General Meeting (annual conference) regarding their resolution/motion in reference to the Corporation Permission. The AGM is held in March/April each year. As part of the due process, DNE reports to industry each year with seminars held in each growing region detailing the outcomes of the previous season and the achievements, or otherwise, that have been made. One of the major KPIs is price based. Horticulture Australia has always been willing to consider interest from other organisations that are interested in representing Australian citrus in the US market."*

2.32 On 18 February, I asked HAL for copies of the DNE reviews. As of this date, I have had no reply. According to its website, ACG appears to be a limited membership. You and I cannot be members of ACG. As we are not citrus growers, we cannot belong to a regional citrus association and therefore cannot be elected or nominated as a member of ACG. How does one outside these organisations access this information? Is it considered proprietary?

2.33 I have been unable to ascertain who and how the KPI's are determined, nor what benchmarks are used for comparison to evaluate the performance of DNE to market Australian citrus. I have been unable to ascertain whether DNE provide sales forecasts, and whether they do a balance between forecasts and actuals. This organisation has been provided with a monopolistic advantage by selected representatives of the Australian Industry, and hence there should be lots of transparent checks and balances to make sure

it is working well.

2.34 HAL purports to be willing to consider interest from other organisations importing into the US. When I visited HAL last year, their representative positively indicated that there was little chance of having the Corporate Permission altered in spite of all the contrary evidence. The evidence indicates they are not interested in other parties operating in the US. How many interested parties have approached HAL, and how many have been provided with licences to the USA under the Corporate Permission? None.

2.35 Upon information and belief, there are at least 3 appointed importers to Korea (population - 47 million), more than 10 appointed importers to Taiwan (population - 22 million), and Thailand (population - 61 million) respectfully and 1 to the US (population - 282 million). Here is another inconsistency. How does HAL or AGC know that the full potential of the market in the US is being achieved by one importer when

- in Korea there are 3 appointed importers to access a population one sixth (17%) that of the US?
- in Taiwan there are more than 10 appointed importers to access a population one thirteenth (8%) that of the US?
- in Thailand there are more than 10 appointed importers to access a population one fifth (21%) that of the US?

2.36 The current agreement with DNE is without a doubt, discriminating. Lemon growers sent no lemons to the US last year in spite of a demand. The plight of lemon growers was being dictated to by a US corporation whose interest lay in importing Argentine lemons, in preference to Australian lemons, and its own business priorities. If DNE does not want to market Australian lemons, then there must be freedom to seek an alternative.

2.4 The third question continued to seek information on how the DNE agreement was reviewed.

2.41 HAL: *"The market potential is independently assessed from time to time and has recently been reviewed by the Administrative Appeals Tribunal (AAT). Additionally, a Regulatory Impact Study/Statement was completed in preparation for the formation of the new company Horticulture Australia Ltd. As part of the Deed of Agreement the company has with the Commonwealth, there is a clear annual, three-year and ten year review process that needs to be undertaken by Horticulture Australia in close consultation with AFFA The*

process of these reviews is outlined in the company's Memorandum of Understanding (MoU).

- 2.42 The AAT review was in 1999. When was the last review completed. The Corporate Permission has been in place since 1992, I understand, so there should be a number of reviews available. Were other parties involved? or was it in-camera? I asked for a copy of the MOU referred to above and as to this date have received no reply.
- 2.43 HAL is the organisation issuing and administering the Corporate Permission. Has HAL prepared a report reconciling the key result areas and the performance criteria in terms of achieving HAL objectives for citrus exports in general, and to the US in particular, in 2001 and previous years for AHC? Again no response.
- 2.5 The fourth question sought information on promotional activities associated with the sales of citrus in the US. This could be a measure of the how the market for Australian citrus in the US is expanding. It should also detail how the different citrus products are being promoted.**
- 2.51 HAL: *"The Citrus Industry Report 2000-2001 is a report on levy investments on behalf of the Australian citrus industry. Limited levy money was spent on promoting citrus into the US market while substantial levy money was spent on promoting Australian oranges throughout the Asian region. Promotional funding for the US was provided by growers and exporters outside of the levy system.*
- 2.52 I asked HAL to clarify a number of issues raised in their reply, asking whether there was any report which outlines the promotional funding, especially that provided by growers and exporters outside of the levy system. Did any Australian companies avail themselves of EMDG grants and how did this relate to American (DNE) promotional activities. Did DNE contribute to promotion funding and if so what has been the level of funding by DNE? HAL has not replied.
- 2.53 The relationship between ACG and DNE is, I understand, to be one where DNE promotes all Australian citrus in the US and sells as much as possible. This is why DNE is placed in such an advantageous position with respect to Australian citrus products. What management and administrative process does HAL or AGC have in place to ensure that DNE is maximising the market potential for the Australian product? DNE also sells Argentine lemons and South African oranges. South African oranges are a direct competitor to and closely substitutable with Australian oranges; what is the factual

basis underlying Australia's interest (Riversun) in working with South African interests

- to form a cartel (there are anti-trust laws in the US),
- to improve market share of Australian fruit which is the same commodity as provided by South Africa (if DNE sells South African fruit to a store, how does this help Australian growers?), and
- to give DNE the possibility of playing one country against the other to maximise DNE's returns

2.54 DNE have already shown a lack of commitment to the total Australian citrus crop by

- selling Argentine lemons in preference to Australian, and
- operating in such a way as to leave all responsibility with the Australian grower. Off season fruit is a sought after product, yet DNE, as I understand the situation, operates in an environment where it carries little risk or responsibility⁵. In the July-September period in the Northern Hemisphere it sells the pick of the world navel crop (sizes 72 and 80's and limited numbers of 100' and 113's), DNE can recall advanced payments made to growers on any grounds, sells fruit essentially on consignment, charges growers a repacking fee of about US\$5, when the real cost, I understand is about \$2.50, charges growers cool storage fees, and does not sell into all US states.

Concluding Remarks

- 3.1 I was informed by HAL last year that I could send lemons to US, but they must go through DNE and that they would charge a fee. Upon inquiry to several sources in Australia, it appeared that DNE's fee could be as high as 7.5% to 10%. DNE would act simply as a paper mover. It's a gift to DNE and more than likely at the growers' expense considering the way pricing is structured in the fruit industry. I assume that the Citrus Industry believes that growers can afford such a system, and that HAL endorses it
- 3.2 The excellent returns for navels in the US is related to currency exchange. A model will quickly show how these returns will fall when the exchange rate is lifted to US60c or US70c per AU\$. The profit quickly disappears.
- 3.3 It appears, upon information and belief, that the import agent, DNE, in the US did not want Australian lemons; they were developing arrangements with Argentine suppliers, used the excuse of quality to deny any trade, or were unable to sell Australian lemons in

the US market. The single desk system so "loved" in Australia is being totally misled by the American company and has completely shut down any Australian sales of lemons into the US, even though there are alternative US importers.

- 3.4 There is a secondary flow-on effect associated with the export of lemons to the US. The quality of Queensland lemons are considered inferior compared to the southern state (NSW and SA) lemons. Consequently, Queensland growers need to essentially market their crop before the crop from the southern states come onto the market. If more of the southern state lemons were exported, and less delivered to the domestic markets, then there is an opportunity for the Queensland growers to extend their production season, allow their fruit to increase into a more market acceptable size and ultimately receive higher returns. An impact of exporting lemons to the US is that the Australian Industry overall benefits, ie growers in NSW, SA and Queensland. Queenslanders cannot export lemons because of fruit fly problems.
- 3.5 I note that the citrus industry is seeking government support to enable the industry to be less reliant on the juice industry and more focussed on fresh fruit production. Under the current arrangement with DNE, any government support would be seen as directly benefiting the monopoly with DNE first as they absolutely determine what fruit can be sold by anybody in the US, which is the most profitable market at the moment and very likely in the future. I believe that such a situation is untenable, and goes against competition policy and could be used by the government to knock back any financial support to the citrus industry.
- 3.6 The Citrus Industry is acting like a closed shop. On the one hand it rejects any outside interference in its marketing arrangements in the US. Nobody else can contribute to their industry without paying a penalty. On the other hand it wants the government to support its industry with some form of handout
- 3.7 If the market information provided to me is any indication of that being provided to the Industry on a whole, then it absolutely falls short of the mark and the Citrus industry needs to rectify this situation. They need an accurate understanding of the market they are in. If HAL is not doing the job then ACG should take this activity away from HAL. Growers are paying levies for accurate information. They deserve information provided to them in a form they can readily access and understand.

The current US import system controlled by selected Australian interests locks, out at DNE's discretion, any opportunity for Australian growers and entrepreneurs anxious to expand their trade with the US.

I have made a number of representations to AGC and HAL. Their responses are tardy and I am being stonewalled. AGC do not reply to letters of inquiry; HAL do not reply without considerable follow-up. My experience tells me that a great deal of effort and investment is required to organise appropriate buyers. I have made such an investment, but AGC and HAL are clearly saying that the export of citrus to the US is a closed shop. (Yet the industry wants government financial support.)

I have been informed today (2 April 2002) that the US will prohibit the import of lemons from Argentina for the next two years. Perhaps now DNE might import Australian lemons and all of a sudden their quality will be acceptable.

I hope the Productivity Commission find value in this submission and respond or obtain responses to the issues raised. I would be pleased to discuss the issues further. Please do not hesitate to contact me on, or email..... Please accept my apology for the delay in presenting this submission. I was hoping to have answers from HAL addressing the issues raised in this submission. Unfortunately, HAL has been silent

Yours sincerely

David Tayler