Tininga Limited
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Mt Hagen, WHP
Papua New Guinea

21st July 2026

The Commissioner and Chief Executive Officer
Independent Consumer and Competition Commission
P.O. Box 6394, Boroko
National Capital District
Papua New Guinea

Attention: Mr. Steven Sugl, Executive Manager, Competition Law Enforcement Division

Dear Mr. Daggy,

RE: PUBLIC SUBMISSION ON THE AUTHORIZATION APPLICATION BY SEABREEZE POULTRY LIMITED FOR THE PROPOSED ACQUISITION OF THE POULTRY BUSINESS OF MAINLAND HOLDINGS LIMITED (OUR REF: 7006-1.2/sa)

We write in response to the Independent Consumer and Competition Commission's ("ICCC") invitation for public comment on the Authorization Application lodged by Seabreeze Poultry Limited ("SPL") in relation to its proposed acquisition of the poultry business of Mainland Holdings Limited ("MHL") (the "Proposed Acquisition").

1. Our Interest as a Customer

As a customer purchasing poultry products in the domestic market, our primary concern is that competitive market conditions continue to exist after completion of the Proposed Acquisition, so that pricing, supply reliability, and product quality remain subject to genuine competitive pressure rather than the pricing and supply decisions of a single dominant, vertically integrated group.

2. Feedback Regarding the Proposed Acquisition

We note the ICCC's preliminary assessment that the Proposed Acquisition raises competition concerns, including the foreclosure of independent entry by the Wilmar Group, increased vertical integration between stock feed supply and poultry production, and a resulting market structure that may resemble a duopoly. We share these views from a customer's perspective:

1. Wilmar’s blocked entry into the market does not present a major concern to Tininga Ltd as Associated Mills Ltd (“AML”) is a part of the Wilmar Group, and all strengths of Wilmar’s successful poultry operations will presumably flow through to the operations of SPL. We therefore do not see this as a significant loss of a stronger competitor in the market.

2. The existence of two dominant suppliers in the domestic poultry and egg market has been the norm for 10+ years. By replacing MHL for SPL, we do not see this move as concerning, in fact we welcome it, as it will encourage stronger competition and result in better pricing, customer service and quality standards for retailers and consumers.

3. Our view of the existing market is that currently the Nation’s demand for poultry and egg products far outweighs the supply, therefore are confident that smaller suppliers will have ample opportunities to sell into the market for the foreseeable future even if the Proposed Acquisition is approved.

3. Public Benefits Should Be Tested Rigorously

We understand that SPL, as the applicant, bears the onus of demonstrating that the public benefits of the Proposed Acquisition outweigh its likely public detriments. As a customer, we ask that the ICCC test any claimed benefits (such as efficiency gains, investment, or improved production) rigorously, and satisfy itself that such benefits are likely to be genuinely and durably passed through to customers and consumers, rather than being retained by the merged entity as increased margin.

4. Requested Safeguards if Authorization is Granted

Should the ICCC nonetheless be satisfied that the Proposed Acquisition should be authorized, we respectfully request that the Commission consider imposing conditions to protect customers and preserve competitive market conditions, including:

1. Non-discriminatory access: Requiring that stock feed continue to be supplied to competing poultry producers on fair, reasonable and non-discriminatory terms, so that the merged entity cannot use its upstream position to disadvantage rival poultry suppliers.

2. Price and supply monitoring: Periodic reporting to the ICCC on pricing and supply terms offered to wholesale and retail customers, for a defined period following completion, to allow early identification of any anti-competitive conduct.

3. Support for new entry: Commitments that do not impede, and where possible facilitate, the entry or expansion of independent poultry producers and stock feed suppliers in the PNG market.

4. Review mechanism: A defined review period after which the ICCC may reassess market conditions and the continuing need for, or adequacy of, any conditions imposed.

5. Conclusion

We support a competitive, well-supplied poultry market in PNG and are not opposed in principle to consolidation that delivers genuine efficiencies. However, as a customer, we ask the ICCC to weigh the public benefits claimed by SPL carefully against the significant competition concerns already identified, and to ensure that any authorization granted is accompanied by conditions that safeguard fair pricing, reliable supply and continued competitive dynamism in the market.

We thank the ICCC for the opportunity to comment and would welcome the opportunity to discuss our submission further if that would assist the Commission's assessment.

Yours sincerely,

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Patrick Duckworth
Managing Director
Tininga Limited