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Sent: 13 September 2006 09:16
To: Modifications

Subject: Response to Code Modification Proposal 0108

I apologise for the late submission of this response, but my attention was drawn to the issue only late yesterday. In the holiday absence of my colleague Helen Bray I have been unable to establish whether she may already have responded on the Chemical Industries Association's behalf. However, I regard this issue as too important to risk failing to make any response.

CIA believe in open, competitive and transparent markets and would like to register our opposition to this proposed modification. We believe it goes against the arguments already accepted after long debate in Modification 006. Indeed, 0108 seeks to undermine the principles of 006. The attempt to push through what is in effect a "wrecking amendment" at such a late stage smacks of a deliberate ploy to get in by the back door what was rejected at the front.

The Rough storage facility enjoys what is in practice a monopoly in long range storage. It should be obliged to follow the rules on information release laid down in 006.

Yours sincerely

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