

6 March 2017

Kate Slater
Australian Codex Contact Point
Australian Government Department of Agriculture and Water Resources
18 Marcus Clarke Street
Canberra ACT 2601

Via email: codex.contact@agriculture.gov.au

Dear Kate

RE: - CL 2017/27-CF Requesting comments at step 3 on the Proposed Draft Annex on the Prevention and Reduction of Ergot and Ergot Alkaloids Contamination in Cereal Grains for inclusion in the Code of Practice for the Prevention and Reduction of Mycotoxin Contamination in Cereals (CAC/RCP 51-2003)

I refer to the recent email advice of 21 February 2017 seeking comments on the above-mentioned topic.

1. About Grain Trade Australia

Grain Trade Australia (GTA) is the focal point for the commercial grains industry within Australia. It facilitates trade and works to provide an efficient, equitable and open trading environment by providing leadership, advocacy and commercial services to the Australian grain value chain.

GTA members are responsible for over 95% of all grain storage and freight movements made each year in Australia. Over 95% of the grain contracts executed in Australia each year refer to GTA grain standards and/or trade rules.

GTA members are drawn from all sectors of the grain value chain from production to domestic end users and exporters. GTA members are involved in grain trading activities, grain storage, human and stock feed milling. A list of GTA Members is attached.

2. About Grain Producers Australia

Grain Producers Australia (GPA) represents Australia's broadacre, grain, pulse and oilseed producers at the national level. Broadly stated, GPA was created to foster a strong, innovative, profitable, globally competitive and environmentally sustainable grains industry in Australia.

The objectives of GPA are to establish a strong independent national advocate for grain producers based on a rigorous and transparent policy development process; engage all sectors of the Australian grains industry to ensure operation of the most efficient and profitable grain supply chain; and facilitate a strategic approach to Research, Development and Extension (RDE) intended to deliver sound commercial outcomes from industry research.

Within this context, GTA provides comment on the Proposed Draft Annex on the Prevention and Reduction of Ergot and Ergot Alkaloids Contamination in Cereal Grains for inclusion in the Code of Practice for the Prevention and Reduction of Mycotoxin Contamination in Cereals (CAC/RCP 51-2003).

3. Concerns with the Annex

a. General Australian Crop Conditions

Whilst we understand the Annex is to apply to world crop production and are general principles to apply, many of those steps being proposed are not relevant to normal Australian dryland farming techniques. The prescriptive nature of a number of the proposals are not in line with a science based and risk management approach adopted by Australian growers or relevant to Australian cereal growing conditions.

The deterioration of Ergot and Ergot Alkaloids under dry and hot Australian summer conditions is well known and needs to be taken into consideration. Many of the steps being proposed are therefore unnecessary in Australia.

b. Australian Crop Management Practices

The preferred management practices (e.g., tillage) outlined in the Annex are in direct opposition to current crop management practices being increasingly adopted by Australian grain growers. In particular:

- To maintain market access. The current EU sustainability agreement established for the canola industry is at odds with many of the processes outlined in the Annex.
- Australian grain producers have been steadily moving towards a minimum tillage/no tillage system for grain production.

In summary, whilst the Annex and General Code of Practice acknowledge the importance of applying alternative management of Ergot in minimum tillage systems, there appears to be a limited focus and emphasis on these alternative arrangements.

The Annex appears to focus on many outdated farming practices and a greater emphasis should be placed on adoption of more modern farming practices to minimise Ergot and Ergot Alkaloids reflecting current Australian farming practices.

Thank you for consideration of this response.



Pat O'Shannassy
Chief Executive Officer

2017 Grain Trade Australia Financial Members

A & B Grains Pty Ltd
A C Grain
A T Waterfield & Son Pty Ltd
A W Vater and Co
ACCB Australia
Adams Australia Pty Ltd
ADM Australia Pty Ltd
Advance Trading Australasia
Ag Scientia Pty Ltd
Agfarm Pty Ltd
AgLink - CMS
Agmark Pty Ltd t/as Agmark Commodities
Agracom Pty Ltd
Agrex Australia
Agri Om Australia Pty Ltd
Agriex Australia Pty Ltd
Agrifood Technology Pty Ltd
Agrifoods Australia
AGRIGRAIN
Agri-Oz Exports Pty Ltd
Agrisk Management Pty Ltd
Agromin
All Commodities Pty Ltd
Allied Grain Pty Ltd
Allied Mills
AMPS Agribusiness Group
Arrow Commodities Pty Ltd
Associated Grain
ASX Limited
Auscott Ltd
Ausican Commodities
Ausrealt International Pty Ltd
Australia And New Zealand Banking Group
Australia Milling Group Pty Ltd
Australian Choice Exports Pty Ltd
Australian Grain Export Pty Ltd
Australian Grain Growers Co-operative Limited
Australian Grain Storage
Australian Grain Technologies Pty Ltd
Australian Growers Direct Pty Ltd
Australian Mungbean Company Pty Ltd
Australian Superintendence Company
AvantAgri Australia Pty Ltd
Avigrain Produce
Baker Grain
Barooga Agriproducts
Basis Commodities
Berriwillock Grain Storage Co-Operative Ltd
BFB Pty Ltd
Big River Feeds Pty Ltd
Blairs Produce Company
Blue Ribbon Seed and Pulse Exporters
Boort Grain Co-Operative Ltd
Brightcom Australia Pty Ltd
Broadbent Grain
Broun and Co Grain Marketing Services Pty Ltd
Bunge Agribusiness Australia Pty Ltd
Bungulla Farming Pty Ltd
C & S Trading Pty Ltd
C K Tremlett Pty Ltd
Cameron Pastoral Company Pty Ltd
Cargill Australia Limited
Castlegate James Australasia Pty Ltd
CCIC Australia Pty Ltd
Centre State Exports Pty Ltd
Cereal Milling Services Pty Ltd
Chinatex (Aust) Wool Co Pty Ltd
CHS Trading Company Australia
CIS Commodity Inspection Services
Clear Grain Exchange
Cleveland Agriculture
CloudBreak Grain Marketing Pty Ltd
Cogeser (Australia) Pty Ltd
Commex International Pty Ltd
Commodity Inspection Services (Australia) Pty Ltd
Commonwealth Bank of Australia
Co-operative Bulk Handling Limited
Coorow Seeds
COPRICE
Cremer Australia Pty Ltd
DA Hall and Co
Dalby Bio-Refining Limited
Dalgrains (Qld) Pty Ltd
Darwalla Milling Co Pty Ltd
Deacon Seeds
Deckert Group Pty Ltd
Defiance Maize Products Pty Ltd
Delta Agribusiness Pty Ltd
Demeter Cormack Pty Ltd
Direct Commodities Pty Ltd
Donnellons Bulk Haulage Pty Ltd
East Coast Stockfeed Pty Ltd
ED & F Man Grains Australia

Elders Rural Services Australia Limited
Emerald Group Australia Pty Ltd
EP Integrated Commodities Pty Ltd
Export Trading Group Australia Pty Ltd
Farm Tender
Farmanco Marketing Pty Ltd
FarMarCo Australia Pty Ltd
Feed Central Pty Ltd
Fellows Nominees
FertInvest Pty Ltd
Findlays Barellan
Finesse Solutions Pty Limited
Fletcher International Exports Pty Ltd
Flexi Grain Pty Ltd
Foss Pacific Pty Ltd
Fox Commodities
Free Eyre Grain Pty Ltd
Gehrke Grains and Transport Pty Ltd
George Weston Foods Limited
Glencore Grain Pty Ltd
Golden Harvest Grain Exports Pty Ltd
Goldman Sachs Financial Markets Pty Ltd
Goldstar Commodities
Goodman Fielder Limited
Grain Brokers Australia
Grain Direct Australia
Grain Growers Limited
Grain Industry Association of South Australia
Grain Industry Association Of Victoria
Grain Industry Association of Western Australia
Grain Link (NSW) Pty Ltd
Grain Link WA Pty Ltd
Grain NSW
Grain Producers Australia Ltd
Grain Storage Solutions
Graincorp Operations Ltd
Grainforce Pty Ltd
Grainpro Pty Limited
GrainTrend Pty Ltd
Grainx
Greentree Farming
GV Grain & Fodder
Hamilton Contracting (NSW) Pty Ltd
Hanlon Enterprises Grain
Harberger's Farm Supplies (Trading) Pty Ltd
Harvestcheck Pty Ltd
Hassad Australia Operations Company Pty Ltd
Hay Plains Grain Storage Pty Ltd
Holding Redlich
Holman Fenwick Willan
Horizon Grain Brokers Pty Ltd
Igrain.com.au Pty Ltd
IKON Commodities Pty Ltd
Iloura Resources Pty Ltd
Independent Grain Handlers Pty Ltd

Inghams Enterprises Pty Limited
Intertek
Intl FC Stone Australia Pty Ltd
Irwin Stockfeeds
Itochu Australia Ltd
J K International Pty Ltd
J.W. Koek & Company
James Stock Feed and Fertilizer Pty Ltd
JBS Australia
Jerilderie Grain Storage & Handling
K M & W M Kelly & Sons
Kangaroo Island Pure Grain
KB Agri Services Pty Ltd
Kennett Rural Services Pty Ltd
Knight Commodities
Lachlan Commodities Pty Ltd
Laharum Bulk Handling Co
Lake Grain Pty Ltd
Lane Grain Pty Ltd
Langdon Grain Logistics
Laragon Almond Processors Pty Ltd
Laucke Flour Mills P/L
Lawson Grains Pty Ltd
Lempriere Grain Pty Ltd
Lodehaul
Louis Dreyfus Commodities Australia Pty Ltd
LPC Trading Pty Ltd
Mallon Commodity Brokering
Malteurop Australia Pty Ltd
MarketAg Pty Ltd
Matthews Transport and Grain Traders
Max Grains Pty Ltd
MC Croker Pty Limited
McDonald & Pelz Australia
McMullen Consulting Pty Ltd
McNaughts Grain & Fertilizer Pty Ltd
MCS Grain Pty Ltd
Melaluka Trading Pty Ltd
Mellco Pty Ltd
Merricks Capital Pty Limited
Mirfak P/L
Mitsui And Co (Australia) Ltd
Moulamein Grain Co-Operative Ltd
Mountain Industries Pty Ltd
Moxey Farms Pty Limited
MSM Milling Pty Ltd
Murray Goulburn Trading Pty Ltd
Murrumbidgee Grains Pty Ltd
Namoi Cotton Co-Operative
Nandaly Grain Co-Operative Ltd
Network Grains Pty Ltd
Newcastle Agri Terminal Pty Ltd
Nidera Pty Ltd
Noble Resources Australia Pty Ltd
Northern Riverina Grains Pty Ltd

NSW Farmers Association
NZX Australia (ACF, PFA)
OMIC Australia Pty Ltd
OOMA Enterprises NSW Pty Limited
Origin Grain Pty Ltd
Pallinup Logistics
PB Seeds Pty Ltd
PeaCo
Pearson's Grain Pty Ltd
Perkins Commodity Brokers
Perten Instruments Australia Pty Ltd
Peter McQueen Pty Ltd
Peters Commodities Pty Ltd
Phoenix Commodities (Australia) Pty Ltd
Pinnacle Commodities Pty Ltd
Planfarm Marketing Pty Ltd
Plum Grove Pty Ltd
Premium Grain Handlers P/L
Preston Grain
Primal Foods Group
Pulse Association of the South East (PASE)
Quadra Commodities Pty Ltd
Quattro Ports
Queensland Agricultural Merchants Inc.
Quest Commodities Pty Ltd
Quirindi Grain & Produce
Reid Stockfeeds Pty Ltd
Ridley Agriproducts Pty Ltd
Riordan Grain Services
Rivalea Australia
Riverina (Australia) Pty Ltd
Riverina Oils & BioEnergy Pty Ltd
Robinson Grain Trading Co Pty Ltd
Roty Grain Store
Ruddenklau Grain Pty Ltd
Rural Directions Pty Ltd
Rural Logic (Aust) Pty Ltd
SANWA Pty Ltd
SBA Law
Seedhouse Tasmania
SGA Solutions Pty Ltd
SGS Australia Pty Ltd
Shannon Bros Bulk Haulage
Shearwater International Pty Ltd
Silo Bag Grain (NSW QLD) Pty Ltd
Societa Cofica Pty Ltd
Southern Ark Storage Pty Ltd
Southern Cotton Trading Pty Ltd
Southern Cross Agricultural Exports P/L
Southern Grain Storage
Southern Stockfeeds (Operations) Pty Ltd
Spagrimon Australia Pty Limited
Special One Grain Accumulator Pty Ltd
Standard Commodities Australia Pty Ltd
Sumitomo Australia Pty Ltd

Summer Hill Grains
Symbio Laboratories
Tasmanian Agricultural Producers Pty Ltd
TE Storage & Logistics Pty Ltd
Teague Australia Pty Ltd
Ten Tigers
Thallon Grains Pty Ltd
TSS Grain P/L
Twynam Pastoral Company
Unigrain Pty Ltd
Unique Grain Management Pty Ltd
United World Enterprises Pty Ltd
Victorian Farmers Federation
W B Hunter Pty Ltd
Wakefield Grain Export Services
Ward McKenzie Pty Ltd
WHG Oceania Pty Ltd
Whitty Produce
Whyalla Beef Pty Ltd
Wilken Grain
Wilmar Gavilon Pty Ltd
Wimmera Mallee Commodity Services Pty Ltd
Wimmera Mallee Grain Services
Wimpak Export Company Pty Ltd
Woodside Commodities Pty Ltd
WW Agri Pty Ltd
XLD Grain Pty Ltd
Yenda Prods Grain Pty Ltd