

6 October 2015

Mr Paul Taylor  
Safe Work Australia  
GPO Box 641  
Canberra ACT 2601

Via email: [paul.taylor@swa.gov.au](mailto:paul.taylor@swa.gov.au)

Dear Mr Taylor,

**Re: Report of the Committee of Experts on the Transportation of Dangerous Goods and on the Globally Harmonized System (GHS) of Classification and Labelling of Chemicals - Dust Explosion Hazards**

**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, grain processing for human and stock feed milling.

GTA also attracts membership from organisations to the side of the value chain in related commercial activities such as financial (banking, stock exchanges etc), communications, grain advisory services, and professional services (e.g. solicitors and accountants).

Within this context, GTA provides comment on the abovementioned topic.

**2. Nature of the Issue**

This submission is in response to the ongoing discussions relating to the potential for grain and grain dust to be categorised as a “dust explosion hazard”.

The Globally Harmonised System (GHS) is intended to provide for harmonisation of the classification of chemicals, labelling and safety data sheets. Grain is not exempted from consideration under the GHS. Since countries are obligated to adopt the GHS, developments that are designed to define and classify dust explosion hazards are of major concern to the Australian grain industry.

If a GHS chapter is adopted and it encompasses grain, the Australian and indeed the global grain handling, processing and distribution system will be forced to accommodate significant changes to both domestic and international regulatory requirements and management practices.

Changes such as this are unnecessary given proven and well established industry safety practices and actually could be counterproductive by creating confusion among the receivers of grain and grain products potentially leading to food security issues.

### 3. Australian Grain Industry View

It is the view of the Australian grain industry that grain dust explosion hazards should not be included in the GHS for classification and labelling of chemicals. There are a number of reasons for this view as outlined below:

**3.1 Quality systems in the Australian grain industry.** The industry relies on self-regulation, involving a system and culture of continued improvement. Central to this strategy is industry adoption of common grain trading standards, outlining the quality of grain desired by the market and traded overseas.

These standards list maximum levels for contaminants such as foreign material (including dust etc) and screenings material. These standards are set based on market requirements and have enabled Australian grain to maintain its reputation of being low in screenings and safe for human and animal consumption. As stated above, while these standards are not mandatory, over 95% of industry trade grain based on these common standards.

#### 3.1.1 Australia Grain Industry Code of Practice for the management of grain within the Australian Grain Supply Chain

Adherence to the Code of Practice (Code) is mandatory for all members of Grain Trade Australia (refer attached list).

The purpose of the Code is to describe practices that the Australian grain industry use to ensure Australian grain and grain products meet domestic or export customer requirements.

Customer requirements include those stipulated in contracts and regulatory requirements at the:

- Australian State, Territory and Federal levels; and
- international and overseas country level.

There are also a range of industry standards that are covered under the Code of Practice.

The Code also includes Technical Guideline Documents which provide detailed information to industry on specific activities. GTA has just commenced a **Safety Health & Environment** project to develop specific TGDs relating to the storage of grain and includes the following topics:

|   |                                    |
|---|------------------------------------|
| Hazardous Substances / Dangerous Goods  | Tarping of Bulk Grain and Bunkers  |
| Confined Spaces                         | Working at Heights                 |
| Fumigation Safety                       | Return to Work / Injury Management |
| Rail Safety                             | Working Alone                      |
| Road Safety                             | Fire                               |
| Machinery Guarding                      | Contractor Safety                  |
| Fitness for Work (including grain dust) | Mobile Plant                       |
| Fatigue Management                      | Isolation and Lock Out             |
| Personal Protection Equipment (PPE)     |                                    |

The above topics will detail issues specifically related to the issue of hazardous materials but also other topics that would be of interest to Safe Work Australia.

#### 3.1.2 Grain Transport Code of Practice

This Code has been developed as an important tool to assist participants transport grain to their designated markets quickly, safely and within the relevant laws. It is referenced as a Technical Guideline Document in the Australian Grain Industry Code of Practice.

#### 3.1.3 Third party audited quality assurance systems

All major bulk handling companies have ISO certified quality systems which would include:

- ISO 9001 for quality management; and
- ISO 14001 for environmental management.

QA systems noted above address issues such as:

- Extensive hygiene measures such as facility design to minimise dust, cleardown of facilities, dust extraction etc are used throughout country storage facilities and at export terminals. In addition, during bulk vessel loading, unloading spouts are designed to minimise dust, although the risk of dust explosion at this point is generally regarded as relatively low compared to other areas of grain facilities.
- Regulations in Australia already cover the requirement for facilities to manage the potential explosive nature of dust. Recognising the various factors needed for dust to become “explosive” (particle size, dispersal/concentration, ignition source, oxygen etc) these regulations cover both the design of the facilities (and fittings etc) and the occupational health and safety issues associated with grain dust (exposure standards etc).

While adherence to these regulations in grain handling operations throughout the supply chain is therefore mandatory, many facilities operate at a level that may be of a standard higher than the minimum required. To include additional regulations that are over and above national regulations, may lead to excessive costs and practices that provide no practical benefit. Given that similar regulations apply in other exporting countries, development of an agreed international position may be impractical.

- Australian grain has a reputation of being low in screenings and relatively clean and free of dust. Extensive management systems are employed at all stages of the grain supply chain to manage the quality of the grain and ensure grain is supplied to customers that meets contractual requirements and is considered to be safe for human and animal consumption. These practices have operated successfully for many years, with minimal intervention from Government via legislation and regulations.

#### 4. Implications to the global grain supply chains

If grain and grain dust was included it would have substantial ramifications in relation to:

1. grain transport and storage assets; and
2. work, health and safety policies.

##### 4.1 Grain transport and storage assets

There is no one supply chain for the movement of grain in Australia. Grain can be moved from the paddock to storage sites in regional locations operated by large bulk handling companies or direct to a domestic end user or export terminal. The mode of land based movement can be truck or rail.

The following tables give an overview of the number of movements by various types of transportation in Australia and on a global basis each year. The tables should be viewed from the basis of the enormity of the compliance requirements should grain and grain dust be classified as a hazardous material.

| <b>Australia</b>              | <b>Tonnes per movement</b> | <b>Production in tonnes/Aust.</b> | <b>No. of movements</b> |
|-------------------------------|----------------------------|-----------------------------------|-------------------------|
| <b>Road movements</b>         | 50                         | 40,000,000                        | 800,000                 |
| <b>Train movements</b>        | 2,000                      | 40,000,000                        | 20,000                  |
| <b>Bulk shipping (export)</b> | 60,000                     | 30,000,000                        | 500                     |

| <b>Global</b>                 | <b>Tonnes per movement</b> | <b>Production in tonnes/global</b> | <b>No. of movements</b> |
|-------------------------------|----------------------------|------------------------------------|-------------------------|
| <b>Road movements</b>         | 50                         | 2,500,000,000                      | 50,000,000              |
| <b>Train movements</b>        | 8,000                      | 2,500,000,000                      | 312,500                 |
| <b>Bulk shipping (export)</b> | 60,000                     | 360,000,000                        | 6,000                   |

Should grain and grain dust be reclassified all the existing grain transport and storage assets would need to comply with an entirely new set of regulations at an inestimable cost. Suffice to say many assets would require complete replacement.

GTA respectfully requests that the Committee consider the enormous economic implications in regards to the proposal.

#### **4.2 Grain is not a dangerous good in international transport regulations.**

The International Maritime Organisation has established grain as non-hazardous. The requirements for the transport of grain are specifically covered by the International Code for the Safe carriage of Grain in Bulk (International Grain Code), 1991. This “Grain Code “ extends to the harmonisation of classification and labelling that is largely in place for physical hazards and acute toxicity based on the work of the UN Economic and Social Council’s Committee of Experts on the Transport of Dangerous Goods (UNCEDTG).

#### **5. GHS technical considerations**

The attached technical briefing note from the Grain & Feed Trade Association (GAFTA) argues that:

- Creating a new class of hazard in the GHS for those dusts or mixtures of dust with air coming from substances which are not intrinsically explosive, is not justified, as it would go against the GHS classification criterion.
- These types of dusts do not meet the definition of “explosive substance”; and
- Safety Data Sheets (SDS) are the most effective instrument in approaching the issue in question.

#### **6. Summing up**

The potential inclusion of grain dust regulations is not required and will potentially lead to:

- overly burdensome regulations; leading to
- additional costs for no additional benefit.

The Australian grain industry requests you support our views that grain is not included as a chemical hazard at future meetings of the sub-committee and at other relevant forums where the topic of grain dust occurs.

In the alternative, should there be move to reclassify grain and grain dust that any dust explosion hazard definition and classification that ultimately may be agreed, be added as an Annex to the GHS and not as a full Chapter. An Annex can serve as guidance document and not as a mandatory requirement.

Should you require any clarification of this issue, please do not hesitate to contact me.

Yours sincerely



Geoff Honey  
Chief Executive Officer

## GAFTA (draft) Position Paper on Dust Explosion Hazard

### Introduction

The purpose of this paper is to state Gafta's position regarding the debates taking place in the Sub-Committee of Experts on the Globally Harmonized System (GHS) of Classification and Labelling of Chemicals in the United Nations with reference to the issue of "Dust Explosion Hazard".

This paper refers only to dusts originated from agricultural products.

We are aware that there are currently two approaches under consideration in the Sub-Committee regarding the question of "Dust Explosion Hazard:"

(1) to introduce a new hazard class in the GHS, or

(2) to set specific guidance for the communication of hazards following a harmonized approach.

These options are considered below.

### GHS New Hazard Class

Regarding the first option, **we do not agree on introducing a new hazard class within the GHS** due to the fact that the GHS clearly states that, in order to create a new class, the substance or mixture of substances to be classified must have an intrinsic hazardous property which calls for its classification.

Section 1.3.2.2.1 of the GHS reads:

*"The GHS uses the term "hazard classification" to indicate that only the intrinsic hazardous properties of substances or mixtures are considered."* (The underlining is ours.)

Also, Section 1.1.3.1.1. of the GHS reads:

*"The goal of the GHS is to identify the intrinsic hazards found in substances and mixtures and to convey hazard information about these hazards..."* (The underlining is ours.)

We do not believe that all the dusts or mixtures of dusts with air are intrinsically hazardous substances, nor are they intrinsically explosive. Thus, it becomes necessary to clearly distinguish between those dusts whose explosive property is inherent of the substances originating them – intrinsic property - and those dusts which come from substances or solids which are NOT intrinsically explosive. For the dusts coming from substances which are not intrinsically explosive - but may be combustible - or the mixtures of these with air, to pose an explosion hazard, there must be a combination of factors such as particle size, a necessary minimum concentration of the particles in the air (Low Flammable Limit), the existence of a minimum energy source of ignition and the condition of confinement, all of which must be simultaneously present to generate an explosion. Therefore, the release of a combustible dust from a condition of confinement (e.g., a building) means that it has escaped confinement and thus does *not* present a dust explosion hazard.

The Grain and Feed Trade Association

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An example of this type of dust is the dust from agricultural products. Gafta does not consider these types of products, including when presented in dust form, as presenting an intrinsic hazardous property. So we do not agree that these types of products could potentially be included in a possible classification in the GHS.

In Annex 1, we provided a flowchart containing the conditions which must be present for a dust explosion hazard to exist. However, in no way do we believe this quality is an intrinsic property of all combustible dusts or mixtures of dusts with air.

On the other hand, when speaking about “Dust Explosion Hazard”, it appears that the hazard being referenced is that of a physical hazard due to a possible explosion. However, the concept of dust or mixture of dust with air does not necessarily meet the definition that the very GHS presents of explosive substance:

*“An explosive substance (or mixture) is a solid or liquid substance (or mixture of substances) which is in itself capable by chemical reaction of producing gas at such a temperature and pressure and at such a speed as to cause damage to the surroundings. Pyrotechnic substances are included even when they do not evolve gases.”<sup>1</sup>*

According to this definition, for a substance to be explosive, the substance or mixture of substances must have the capacity in itself to generate such explosion. It is our opinion, the condition of being a dust or a mixture of dust and air together is not enough to generate an explosion. In some dusts, sufficient condition will be granted by the proper nature of the substance originating it; and, in other dusts, coming from non-intrinsically explosive substances, the explosion will only occur given the combination of other conditions, as already mentioned.

**Consequently, we cannot support the proposal to create a new class of hazard in the GHS for those dusts or mixtures of dust with air coming from substances which are not intrinsically explosive, as it would go against the GHS classification criterion. Moreover, we consider that these do not meet the definition of “explosive substance.”**

### **Hazard Communication through Safety Data Sheets**

We support assessing the need to incorporate new and further communication or clarification elements to those already existing, to complete the Safety Data Sheets (SDS), in order to make sure that the dust explosion hazard takes into account the condition enumerated in Annex 1. Gafta is of the view that this approach will be the most effective in addressing the issue in question. Besides, the GHS does not require the substances or mixtures to be the object of classification in order to be able to use them. The last sentence of item A 4.2.1 of GHS reads:

*“...An SDS is a well-accepted and effective method for the provision of information, and may be used to convey information for substances or mixtures that do not meet or are not included in the GHS classification criteria.”*

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<sup>1</sup> GHS, Chapter 2.1 Explosives, Section 2.1.1.1, p 43. The same definition is in Chapter 1.2 Definitions and Abbreviations, p 12.

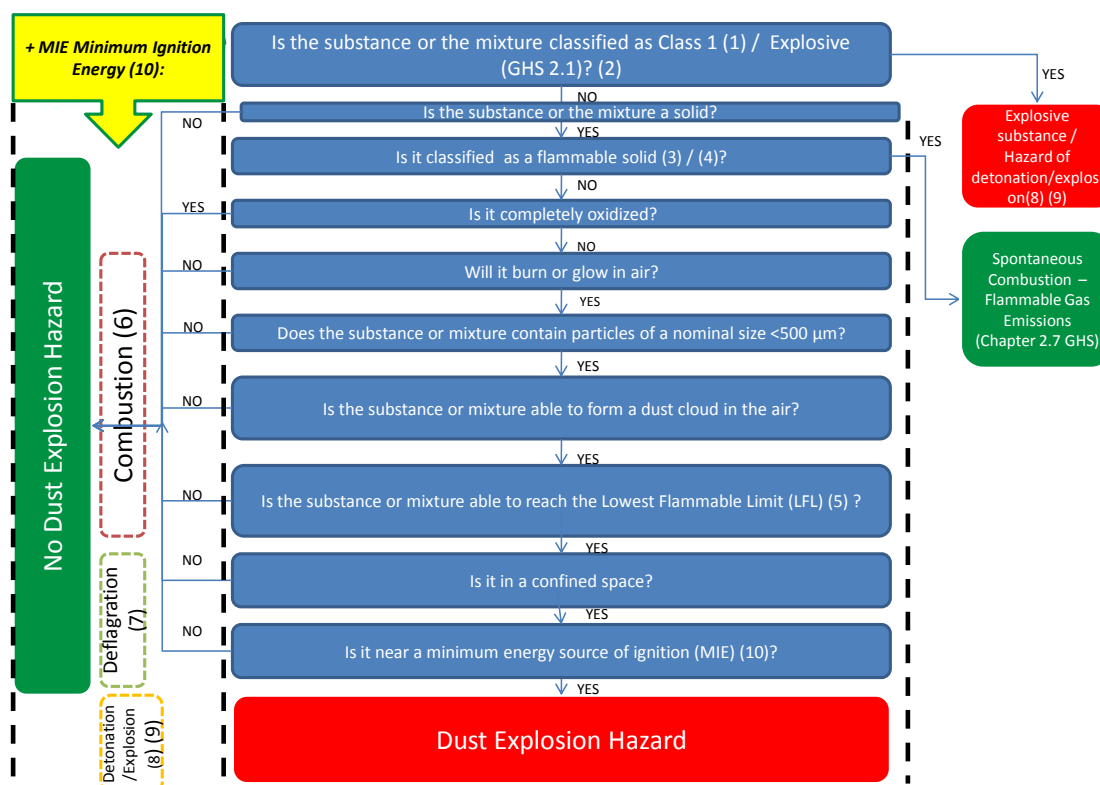
## Conclusion

In conclusion, we believe that:

- Creating a new class of hazard in the GHS for those dusts or mixtures of dust with air coming from substances which are not intrinsically explosive, is not justified, as it would go against the GHS classification criterion.
- These types of dusts do not meet the definition of “explosive substance”.
- Safety Data Sheets (SDS) are the most effective instrument in approaching the issue in question. We support assessing the need to incorporate new communication or clarification elements to those already existing, taking into account the simultaneous condition enumerated in Annex 1.

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## Annex I – Flowchart to identified dust explosion hazard



(1) **Class 1** comprises explosive substances (a substance which is not itself an explosive but which can form an explosive atmosphere of gas, vapour or dust is not included in Class 1), except those that are too dangerous to transport or those where the predominant hazard is appropriate to another class. [Recommendations on the Transport of Dangerous Goods: Model Regulations (18th Revised Edition), section 2.1.1.1. point (a) ]

(2) **Definition of “Explosive Substance” in GHS:** An explosive substance (or mixture) is a solid or liquid substance (or mixture of substances) which is in itself capable by chemical reaction of producing gas at such a temperature and pressure and at such a speed as to cause to the surroundings. Pyrotechnic substances are included even when they do not evolve gases.<sup>2</sup> [GHS, Section 2.1.1.1]

(3) **Class 4 - Flammable solids:** Solids which under conditions encountered in transport, are readily combustible or may cause or contribute to fire through friction; self-reactive substances which are liable to undergo a strongly exothermic reaction; solid desensitized which may explode if not diluted sufficiently. [Recommendations on the Transport of Dangerous Goods: Model Regulations (18th Revised Edition), section 2.4.1.1. point (a) ]

(4) **Definition of “Flammable Solid” in GHS:** A flammable solid is a solid which is readily combustible, or may cause or contribute to fire through friction. [GHS, Section 2.7.1]

(5) **Lower Flammable Limit (LFL):** The lowest concentration of a combustible substance in a gaseous oxidizer that will propagate a flame, under defined test conditions. [NFPA 68,2013]

(6) **Combustion:** A chemical process of oxidation that occurs at a rate fast enough to produce heat and usually light in the form of either a glow or flame. [NFPA 69, 2013]

(7) **Deflagration:** Propagation of a combustion zone at a velocity that is less than the speed of sound in the unreacted medium. [NFPA 68,2013]

(8) **Detonation:** Propagation of a combustion zone at a velocity greater than the speed of sound in the unreacted medium. [NFPA 68,2013]

(9) **Explosion:** The bursting or rupturing of an enclosure or a container due to the development of internal pressure from a deflagration. [NFPA 68,2013]

(10) **Minimum Ignition Energy (MIE):** The minimum amount of energy released at a point in a combustible mixture that causes flame propagation away from the point, under specified test conditions. [NFPA 68,2013]





# GRAIN TRADE AUSTRALIA

Membership List as at 10 September 2015

| Organisation                                     | Contact                | Website /Phone            |
|--|------------------------|---------------------------|
| <b>Ordinary Member (Trading)</b>                 |                        |                           |
| <b>Level A1 (over 7 Million Tonnes)</b>          |                        |                           |
| Cargill Australia Limited                        | Ms Penne Kehl          | cargill.com.au            |
| Co-operative Bulk Handling Limited               | Mr Jason Craig         | cbh.com.au                |
| Glencore Grain Pty Ltd                           | Mr Phillip Hughes      | glencoregrain.com.au      |
|  |                        | <b>3</b>                  |
| <b>Level A2 (5 - 7 Million Tonnes)</b>           |                        |                           |
|  |                        | <b>0</b>                  |
| <b>Level A3 (3 - 5 Million Tonnes)</b>           |                        |                           |
| ADM Trading Australia Pty Ltd                    | Mr Tim Henry           | adm.com                   |
| Graincorp Operations Ltd                         | Mr Neil Johns          | graincorp.com.au          |
|  |                        | <b>2</b>                  |
| <b>Level A4 (1.5 - 3 Million Tonnes)</b>         |                        |                           |
| PentAg Nidera Pty Ltd                            | Mr David Lengren       | pentagnidera.com.au       |
| Emerald Grain Pty Limited                        | Mr John Warda          | emeraldgrain.com          |
|  |                        | <b>2</b>                  |
| <b>Level B1 (1.0 - 1.5 Million Tonnes)</b>       |                        |                           |
| Bunge Agribusiness Australia Pty Ltd             | Mr Chris Aucote        | bunge.com/Agribusiness    |
| CHS Trading Company Australia                    | Mr Jon Bucknall        | chsinc.com.au             |
| Louis Dreyfus Australia                          | Mr Robert Green        | louisdreyfus.com.au       |
|  |                        | <b>3</b>                  |
| <b>Level B2 (500,000 - 1 Million Tonnes)</b>     |                        |                           |
| Agrex Australia Pty Ltd                          | Mr David Johnson       | agrexaustralia.com.au     |
| George Weston Foods Limited                      | Mr Mark O'Brien        | gwf.com.au                |
| Inghams Enterprises Pty Limited                  | Mr Graeme Dillon       | ingham.com.au             |
| Plum Grove Pty Ltd                               | Mr Tony Smith          | plumgrove.com.au          |
| Ridley Agriproducts Pty Ltd                      | Mr Michael Reeves      | agriproducts.com.au       |
| Riverina (Australia) Pty Ltd                     | Mr Jon Mulally         | riverina.com.au           |
|  |                        | <b>6</b>                  |
| <b>Level B3 (250,000 - 500,000 Tonnes)</b>       |                        |                           |
| Agracom Pty Ltd                                  | Mr Joe Hallman         | agracom.com.au            |
| AGRIGRAIN  | Mr Jeremy Brown        | agrigrain.com             |
| Arrow Commodities Pty Ltd                        | Mr Dominic Vanzella    | arrowcom.com.au           |
| Australian Grain Export Pty Ltd                  | Mr John Thiele         | 08 8832 2800              |
| Australian Grain Growers Co-operative Limited    | Mr Ian Schofield       | aggeop.com.au             |
| Centre State Exports Pty Ltd                     | Mr Jeff Voigt          | centrestateexports.com.au |
| Chinatex Australia Pty Ltd                       | Mr Jiling Lai          | 02 9957 2688              |
| COPRICE  | Ms Kirsty Cutter       | coprice.com.au            |
| Direct Feeds Australia Pty Ltd                   | Mr Sam Vale            | 03 5853 1744              |
| Lempriere Grain Pty Ltd                          | Mr Jonathan Holdsworth | lemprieregrain.com.au     |
| Mitsui and Co (Australia) Ltd                    | Mr Kane Fukuoka        | mitsui.com                |
| Riordan Grain Services                           | Mr Bradley Hogan       | riordangrains.com.au      |
| Special One Grain Accumulator                    | Ms Jaimee Carrigan     | specialonegrain.com.au    |
| <b>Level B3 (250,000 - 500,000 Tonnes) Cont.</b> |                        |                           |

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Wilmar Gavilon Pty Ltd

Mr Jimmy Liu  
Mr Matt Albion

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15

## Ordinary Member (Trading) (contd)

### Level C (under 250,000 Tonnes)

A & B Grains Pty Ltd  
A T Waterfield & Son Pty Ltd  
A W Vater and Co  
Adams Australia Pty Ltd  
Agmark Commodities  
Agri Om Australia Pty Ltd  
Agri-Oz Exports Pty Ltd  
Agriex Australia Pty Ltd  
Agrifoods Australia  
All Commodities Pty Ltd  
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Big River Feeds Pty Ltd  
Blairs Produce Company  
Blue Ribbon Seed and Pulse Exporters  
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Dalgrains (Qld) Pty Ltd  
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Mr Chris Hurwood  
Ms Mariam Boulos  
Mr Brian Pover  
Mr Brendan Macauley  
Mr Robert Danieli  
Mr Bruce Holden  
Mr Tobin Cherry  
Mr Gary Heidenreich  
Mr Terry Deacon  
Mr Chris Deckert  
Mr Rodney Walker  
Mr David Oates  
Mr Bill Donnellon  
Mr Stuart Dolden  
Mr Shayne Clark

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07 3363 8400  
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etgworld.com

|   |                     |                              |
|---|---------------------|------------------------------|
| Feed Central Pty Ltd                        | Mr Tim Ford         | feedcentral.com.au           |
| Fellows Nominees                            | Mr Paul Fellows     | fellowsbulk.com.au           |
| <b>Level C (under 250,000 Tonnes) cont.</b> |                     |                              |
| FertInvest Pty Ltd                          | Mr Preyesh Barar    | fertinvest.com               |
| Findlays Barellan                           | Mr Neil Findlay     | 02 6963 9246                 |
| Fletcher International Exports Pty Ltd      | Mr Jake Young       | fletchint.com.au             |
| FREE Eyre Grain Pty Ltd                     | Mr Mark Rodda       | free-eyre.com.au             |
| Golden Harvest Grain Exports                | Mr Chandru Hiremath | goldenharvest.net.au         |
| Goldman Sachs Financial Markets Pty Ltd     | Mr Nick Carracher   | gs.com.au                    |
| Goodman Fielder Limited                     | Mr Alex Krzanic     | goodmanfielder.com.au        |
| Grain Direct Australia                      | Mr Lyndon Benecke   | graindirect.com.au           |
| Grain Link (NSW) Pty Ltd                    | Mr Paul Pearsall    | 02 6962 9500                 |
| Grain Link WA Pty Ltd                       | Mr Andrew Goyder    | grainlink.com.au             |
| Grainforce Pty Ltd                          | Mr Derek Larnach    | 02 6331 4880                 |
| Grainpro Pty Limited                        | Ms Angela Hawke     | grainpro.com.au              |
| Greentree Farming                           | Mr David Brown      | 02 6751 1228                 |
| GrainTrend Pty Ltd                          | Mr Sanjiv Dubey     | graintrend.com               |
| Grenfell Commodities Pty Ltd                | Mr Trevor Mawhinney | grenfellcomm.com.au          |
| GV Grain & Fodder                           | Ms Joanne Harry     | 03 5828 3063                 |
| Hanlon Enterprises Grain                    | Mr Peter Gerhardy   | 02 6924 1781                 |
| Hassad Australia Operations Company Pty Ltd | Mr James Carson     | 02 8019 7150                 |
| Iloura Resources Pty Ltd                    | Mr Hans Hol         | iloura-resources.com         |
| Independent Grain Handlers Pty Ltd          | Mr Brad Bryant      | igh.net.au                   |
| Irwin Stockfeeds                            | Mr Bryan Irwin      | irwinstockfeeds.com.au       |
| Itochu Australia Ltd                        | Mr Justin Swan      | www.itochu.com.au            |
| J K International Pty Ltd                   | Mr Sandeep Mohan    | jki.com.au                   |
| J W Koek & Company                          | Mr Brian Algate     | 07 3341 4548                 |
| James Stock Feed and Fertilizer Pty Ltd     | Mr Adrian Moule     | jamesstockfeed.com.au        |
| Jerilderie Grain Storage & Handling         | Mr David Barlow     | 03 5886 0344                 |
| K M & W M Kelly & Sons                      | Mr Chris Kelly      | kellygrains.com.au           |
| Kangaroo Island Pure Grain Pty Ltd          | Ms Emma Tonkin      | kipuregrain.com              |
| Kennett Rural Services Pty Ltd              | Mr Andrew Kennett   | kennetrural.com.au           |
| Lachlan Commodities Pty Ltd                 | Mr Tony Cogswell    | 02 6851 2077                 |
| Laharum Bulk Handling Co                    | Mr Donald Carter    | 03 5381 2666                 |
| Lake Grain Pty Ltd                          | Mr Derek Davis      | lakegrain.com.au             |
| Lane Grain Pty Ltd                          | Mr Garry Lane       | 02 6887 3309                 |
| Langdon Grain Logistics                     | Mr Adrian Murphy    | langdongrainlogistics.com.au |
| Laragon Almond Processors Pty Ltd           | Mr Mark Webber      | laragon.com.au               |
| Laucke Flour Mills P/L                      | Mr Roger Laubsch    | laucke.com.au                |
| LDC Enterprises Australia Pty Ltd           | Mr Richard Porter   | 07 3253 5999                 |
| LPC Trading Pty Ltd                         | Mr Simon Langfield  | 02 6383 7222                 |
| Mahony's Transport Services                 | Mr Anthony Foster   | mahonystransport.com.au      |
| Malteurop Australia Pty Ltd                 | Mr Jack King        | 03 5277 1950                 |
| Matthews Transport and Grain Traders        | Mr Neville Matthews | 08 9831 1021                 |
| Max Grains Pty Ltd                          | Mr Jack Fahy        | maxgrains.com.au             |
| MC Croker Pty Limited                       | Mr Greg Carroll     | crokergrain.com.au           |
| Melaluka Trading Pty Ltd                    | Mr Simon Pritchard  | melalukatrading.com.au       |
| Melco Pty Ltd                               | Mr Steve Mellington | 0419 867 971                 |
| Moore Bulk Storage                          | Mr Daryl Moore      | moorestorage.com.au          |
| Moulamein Grain Co-Operative Ltd            | Mr Tony Bellinger   | moulameingrain.com           |
| Mountain Industries Pty Ltd                 | Mr Keith Morgan     | mountainindustries.com.au    |
| Moxey Farms Pty Limited                     | Mr Peter Philipzen  | 0407 103 158                 |
| MSM Milling Pty Ltd                         | Mr Peter MacSmith   | 02 6364 5999                 |
| Murrumbidgee Grains Pty Ltd                 | Mr Peter Hassell    | 02 6937 9100                 |
| Namoi Cotton Co-Operative                   | Mr Shane McGregor   | namoicotton.com.au           |
| Nandaly Grain Co-Operative Ltd              | Mr Tony Bellinger   | 03 5078 1217                 |
| Network Grains Pty Ltd                      | Mr Craig Dennis     | 07 4637 8500                 |

|  |                     |                        |
|--|---------------------|------------------------|
| Newcastle Agri Terminal Pty Ltd                | Mr Jock Carter      | 02 4962 4006           |
| Noble Resources Australia Pty Ltd              | Mr Derek Johnson    | thisisnoble.com        |
| <b>Level C (under 250,000 Tonnes) cont.</b>    |                     |                        |
| Northern Riverina Grains Pty Ltd               | Mr Tony Bellinger   | 03 5032 2553           |
| OOMA Enterprises NSW Pty Limited               | Mr Malcolm Berry    | oomaenterprises.com.au |
| Origin Grain Pty Ltd                           | Mr Peter Brick      | 03 5720 8500           |
| PB Seeds Pty Ltd                               | Mr Peter Blair      | pbseeds.com.au         |
| PeaCo  | Mr Shane Wall       | 03 5497 1766           |
| Pearson's Grain Pty Ltd                        | Mr Darren Pearson   | pearsonsgroup.com.au   |
| Peters Commodities Pty Ltd                     | Mr Michael Oxley    | petcom.com.au          |
| Phoenix Commodities (Australia) Pty Ltd        | Mr Jogesh Virk      | 07 35 537 111          |
| Premium Grain Handlers P/L                     | Mr John Orr         | pgh.com.au             |
| Preston Grain                                  | Mr Andrew Kell      | 02 6977 1733           |
| Pulse Association of the South East (PASE) Inc | Ms Leanne Burr      | 08 9071 3655           |
| Quadra Commodities Pty Ltd                     | Mr Andrew Jackson   | quadra.com             |
| Quirindi Grain & Produce                       | Mr John Webster     | 02 6746 1911           |
| Redrock Corporation (NSW) Pty Ltd              | Mr Jason Tetley     | 0418 866 843           |
| Regal Seed & Grain P/L                         | Mr Damien White     | regalseed.com.au       |
| Reid Stockfeeds Pty Ltd                        | Mr Ian Reid         | reidstockfeeds.com.au  |
| Rivalea (Australia) Pty Ltd - Animal Nutrition | Mr Andrew Philpotts | rivalea.com.au         |
| Riverina Oils & BioEnergy Pty Ltd              | Mr Lachlan Herbert  | riverinaoils.com       |
| Robinson Grain Trading Co Pty Ltd              | Mr Gary Robinson    | robinsongrain.com.au   |
| Roty Grain Store                               | Mr Brian Newman     | 02 6988 8221           |
| Ruddenklau Grain Pty Ltd                       | Mr Tim Ruddenklau   | 08 8842 1314           |
| Rural Logic (Aust) Pty Ltd                     | Mr Michael Wood     | rurallogic.com.au      |
| SANWA Pty Ltd                                  | Mr Charles Emerson  | sanwa.com.au           |
| Seedhouse Tasmania                             | Mr Matthew Crane    | seedhouse.com.au       |
| Shannon Bros Bulk Haulage                      | Mr Clayton Shannon  | 03 5390 2264           |
| Silo Bag Grain (NSW QLD) Pty Ltd               | Ms Lesley Kilby     | 02 6847 1788           |
| Societa Cofica Pty Ltd                         | Mr Dia Ram Sharma   | societacofica.com.au   |
| Southern Ark Storage Pty Ltd                   | Mr Simon Pritchard  | arkstorage.com.au      |
| Southern Cotton Trading Pty Ltd                | Mr Chris Veness     | 02 69 552 779          |
| Southern Cross Agricultural Exports P/L        | Mr Matthew Barnes   | 0427 876 643           |
| Southern Grain Storage Pty Ltd                 | Mr Campbell Brumby  | 03 5267 2351           |
| Southern Stockfeeds (Operations) Pty Ltd       | Mr Brendan Maher    | 03 5437 8295           |
| Standard Commodities Australia Pty Ltd         | Mr Michael Betar    | stancom.com.au         |
| Sumitomo Australia Pty Ltd                     | Mr Tsuyoshi Osumi   | sumitomocorp.com.au    |
| Summer Hill Grains                             | Mr Barney Hughes    | 0428 694 363           |
| Tamma Grains                                   | Mr Kim Packer       | tammagrains.com.au     |
| Tasmanian Agricultural Producers Pty Ltd       | Mr David Skipper    | tasagproducers.com.au  |
| TSS Grain                                      | Mr Trevor Macleod   | tasstockfeed.com.au    |
| Thallon Grains Pty Ltd                         | Mr Andrew Earle     | 02 6756 5004           |
| Twynam Pastoral Company                        | Ms Lesley Heidtman  | twynam.com             |
| Unigrain Pty Ltd                               | Mr Ervin Leong      | unigrain.com.au        |
| Unique Grain Management Pty Ltd                | Mr Mark Thiele      | uniquegrain.com.au     |
| W B Hunter Pty Ltd                             | Mr Stewart Coombes  | 03 5821 5744           |
| Ward McKenzie Pty Ltd                          | Mr Mal Parkhill     | mckenziefoods.com.au   |
| Whitty Produce                                 | Ms Marsha McMonigle | 03 5721 6588           |
| Whyalla Beef Pty Ltd                           | Mr Gino De Stefani  | whyallabeef.com.au     |
| Wilken Grain                                   | Mr Richard Wilken   | wilkens.com.au         |
| Wimpak Export Company Pty Ltd                  | Ms Jo Cameron       | wimpak.com.au          |
| XLD Grain Pty Ltd                              | Mr Lachie Stevens   | xldgrain.com.au        |

159

## Transport Operator

|                                     |                  |                   |
|-------------------------------------|------------------|-------------------|
| Gehrke Grains and Transport Pty Ltd | Mr Julian Gehrke | 07 5465 6695      |
| Wakefield Grain Export Services     | Mr Steve Fallon  | wakefields.com.au |

**Broker****Large**

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**Medium**

|                                 |                     |                       |
|---------------------------------|---------------------|-----------------------|
| Allied Grain Pty Ltd            | Mr Angus Wettenhall | alliedgrain.com.au    |
| Brightcom Australia Pty Ltd     | Mr Simon Robertson  | 03 9591 6300          |
| Cereal Milling Services Pty Ltd | Mr Michael Moss     | 02 4323 9339          |
| FC Stone Australia Pty Ltd      | Mr Brett Cooper     | intfcstone.com        |
| Fox Commodities                 | Mr Paul Cochrane    | foxcommodities.com.au |
| Grain Brokers Australia         | Mr Jeff Winspear    | grainbrokers.com.au   |
| Horizon Grain Brokers Pty Ltd   | Mr Ash Munro        | horizongb.com.au      |
| Igrain.com.au Pty Ltd           | Mr Tom Roberts      | igrain.com.au         |
| McDonald Pelz Australia         | Mr Peter Geary      | mcdonaldpelz.com      |
| Perkins Commodity Brokers       | Mr Craig Perkins    | 03 9645 6846          |
| Teague Australia Pty Ltd        | Mr Tim Teague       | teague.com.au         |

11

**Sole Operator**

|                                  |                       |                         |
|----------------------------------|-----------------------|-------------------------|
| AgLink - CMS                     | Mr Justen Schofield   | aglinkcms.com.au        |
| Cogeser (Australia) Pty Ltd      | Mr Robert Luetolf     | cogeser.com.au          |
| Farm Tender                      | Mr Matt Henke         | farmtender.com.au       |
| Knight Commodities               | Mr Chris Groat        | 07 4671 5221            |
| Link Brokering Pty Ltd           | Mr Dion Costigan      | 03 5444 3295            |
| Mallon Commodity Brokering       | Mr Ian Mallon         | mcbrokering.com         |
| Quest Commodities Pty Ltd        | Ms Jayne Barker       | questcommodities.com.au |
| Shearwater International Pty Ltd | Mr Don Cattanach      | 07 3324 9088            |
| Wimmera Mallee Grain Services    | Mr Rodney Edgerton    | egrainservices.com.au   |
| Woodside Commodities Pty Ltd     | Mr Hamish Steele-Park | woodcomm.com.au         |

10

**Corporate****Large**

|   |                    |                         |
|---|--------------------|-------------------------|
| ASX Limited                             | Mr Kristen Hopkins | asx.com.au/grainfutures |
| Australia And New Zealand Banking Group | Mr Ian Hanrahan    | anz.com.au              |
| Commonwealth Bank of Australia          | Mr Tom Barraket    | commbank.com.au         |

3

**Medium**

|   |                     |                            |
|---|---------------------|----------------------------|
| Agfarm Pty Ltd                                    | Mr Bob McKay        | agfarm.com.au              |
| Agrifood Technology Pty Ltd                       | Ms Doreen Fernandez | 03 9742 0589               |
| Agrisk Management Pty Ltd                         | Mr Brett Stevenson  | 02 9499 4199               |
| Australian Superintendence Company                | Mr Andrew Parry     | 07 3391 8640               |
| NZX Australia (CGX, ACF, PFA)                     | Mr Nathan Cattle    | nzx.com                    |
| Commodity Inspection Services (Australia) Pty Ltd | Mr Mathew Conoulty  | commodityinspection.com.au |
| Foss Pacific Pty Ltd                              | Mr Simon Kirkman    | foss.com.au                |
| Holding Redlich                                   | Mr Geoff Farnsworth | holdingredlich.com         |
| Holman Fenwick Willan                             | Mr Stephen Thompson | hfw.com                    |
| Intertek  | Mr Lee Shilvock     | intertek.com               |
| Macpherson + Kelley Lawyers                       | Mr Tony Gooch       | mk.com.au                  |
| Merricks Capital Pty Limited                      | Mr Adam Davis       | merrickscapital.com        |
| SBA Law   | Mr Jeremy Rosenthal | sbalaw.com                 |
| SGS Australia Pty Ltd                             | Mr James Saunders   | au.sgs.com                 |

14

**Small**

|                                    |                     |                        |
|------------------------------------|---------------------|------------------------|
| Advance Trading Australasia        | Mr Andrew Woodhouse | advance-trading.com.au |
| Ag Scientia Pty Ltd                | Mr Lloyd George     | 03 9598 1980           |
| AvantAgri Australia Pty Ltd        | Mr Peter Woods      | avantagri.com.au       |
| CloudBreak Grain Marketing Pty Ltd | Mr Ed Scamps        | 08 8388 8084           |

|                                      |                       |                              |
|--------------------------------------|-----------------------|------------------------------|
| Delta Agribusiness Pty Ltd           | Mr Michael Parry      | 02 6772 0000                 |
| <b>Corporate - Small (cont)</b>      |                       |                              |
| Direct Commodities Pty Ltd           | Mr Hamish Robertson   | directcommodities.com.au     |
| EP Integrated Commodities Pty Ltd    | Ms Tracey Lehmann     | 08 8627 2304                 |
| Farmanco Marketing Pty Ltd           | Mr Donald McTaggart   | farmanco.com.au              |
| FarMarCo Australia Pty Ltd           | Mr Robert Imray       | 07 4637 6400                 |
| Finesse Solutions Pty Limited        | Mr Malcolm Finlayson  | 02 9872 9270                 |
| Flexi Grain                          | Mr Jarrod Tonkin      | flexigrain.com.au            |
| Goldstar Commodities                 | Mr Geoff Webb         | goldstarcommodities.com.au   |
| Grain Storage Solutions              | Mr Kerry Miles        | grainstoragesolutions.com.au |
| Grainx                               | Mr Chris Hood         | grainx.com.au                |
| HarvestCheck Pty Ltd                 | Mr Stephen Schumacher | 0418 199535                  |
| Hay Plains Grain Storage Pty Ltd     | Mr Ron Harris         | 0404 444 600                 |
| IKON Commodities Pty Ltd             | Mr Simon Clancy       | ikoncommodities.com.au       |
| Import-Export Services Pty Ltd       | Mr Bob Ronai          | 02 9986 3000                 |
| JBS Australia                        | Mr Richard Nicholls   | jbssa.com.au                 |
| MarketAg Pty Ltd                     | Mr Mark Martin        | 02 6747 1590                 |
| McMullen Consulting Pty Ltd          | Mr Gerard McMullen    | 03 8300 0108                 |
| Mirfak P/L                           | Mr Mark Murphy        | mirfak.com.au                |
| Murray Goulburn Trading Pty Ltd      | Mr Gerard Murphy      | 03 5862 2799                 |
| OMIC Australia Pty Ltd               | Mr Yasuhide Okumura   | omicaustralia.com.au         |
| Perten Instruments Australia Pty Ltd | Mr Raul Ovelar        | 02 9870 3400                 |
| Peter McQueen Pty Limited            | Mr Peter McQueen      | petermcqueen.com             |
| Pinnacle Commodities Pty Ltd         | Mr Rod Buckle         | pinnaclecommodities.com.au   |
| Planfarm Marketing Pty Ltd           | Mr Jerome Critch      | planfarm.com.au              |
| Primal Foods Group                   | Mr Peter Longhurst    | 02 8011 4182                 |
| Rural Directions Pty Ltd             | Mr Chris Heinjus      | ruraldirections.com          |
| SGA Solutions Pty Ltd                | Mr David Hudson       | 03 5428 4990                 |
| Ten Tigers                           | Mr Chris Tonkin       | tentigers.com.au             |

32

### International Affiliate

|                                     |                    |                     |
|-------------------------------------|--------------------|---------------------|
| CIS - Commodity Inspection Services | Mr Paul Schweitzer | cis-inspections.com |
|-------------------------------------|--------------------|---------------------|

1

### Industry Association

|                                  |                     |                       |
|----------------------------------|---------------------|-----------------------|
| Agforce Queensland               | Ms Tamara Badenoch  | 07 4699 5526          |
| Grain Growers Limited            | Ms Alicia Garden    | graingrowers.com.au   |
| Grain Industry Association of WA | Ms Larissa Taylor   | giwa.org.au           |
| Grain Producers Australia Ltd    | Mr Andrew Weidemann | grainproducers.com.au |
| NSW Farmers Association          | Mr Justin Crosby    | 02 8251 1827          |
| Victorian Farmers Federation     | Mr Stephen Sheridan | 03 9207 5555          |

6

### Merchant Association

|  |                 |                 |
|--|-----------------|-----------------|
| Grain Industry Association of SA       | Mr Tim Mee      | 08 8395 3572    |
| Grain Industry Association Of Victoria | Mr Colin Peace  | giav.com.au     |
| Grain NSW Inc                          | Ms Joanne Ware  | grainnsw.com.au |
| Queensland Agricultural Merchants Inc. | Mr John Francis | qam.org.au      |

4