



Rob Imray  
Standards Committee Chairman  
Grain Trade Australia

17 March 2017

Dear Rob,

Viterra's response to the proposed changes to the GTA Standards is as follows:

### **3.1.1. VRSG Commodities**

The changes listed to the VRSG are supported. The proposed change of removing the defect cause from the definition will shift the focus of classification to the effect on the grain (and not the cause of the defect). We believe this will assist the classification process and communication with the grower on receipt.

### **4.2 Potential Change: Heavily Discoloured Barley**

With the type of barley defects seen during the 2016/17 harvest, we agree changes are required to the standards and VRSG for discoloured barley. These changes will provide clarity for the industry in future harvests. We propose that the existing Western Australian and wheat terminology be used as a basis where possible. Our suggestions are:

#### ***Definition***

Heavily Discoloured – These are grains with heavy staining of light to dark grey colour that do not contain fungus like growth on the surface. (Industry to agree on a suitable photo for the VRSG).

Grains that are completely black should be classified in the same category as Heat Damaged, Burnt or Mould.

#### ***Standard***

Field Fungi / Heavily Discoloured – Malt Grades: 5 max count per 100 grains. Feed Grades: Not applicable.

We believe that the provision for heavily discoloured grain should be added to field fungi tolerances in the barley standards. This will limit the amount of discolouring received into malting barley, preserving the quality but allowing barley with these affects into feed grades.

### **4.3 Potential Change: Pink Grain / Fusarium - Barley**

We believe the following changes should be considered to reflect the expectations of international markets.

***Definition***

Fusarium Affected – These are grains that are light weight, chalky white and may have a pink, red or salmon-orange discolouration on the surface.

***Standard***

Fusarium Affected – Nil tolerance for all grades and entire loads.

Fusarium affected grain is not accepted into the barley market due to the potential for mycotoxin to occur from the fungal disease. Our preference is to have fusarium affected grain in a separate category with a nil tolerance.

***Definition***

Pink Stained – Healthy kernels which show a pink, red or salmon-orange discolouration anywhere on the grain and is not fungus affected. (Industry to agree on a suitable photo for the VRSG.)

***Standard***

Pink Stained – Malt Grades: Nil count per 100 grains. Feed grades: F1- 1 max count per 100 grains and F2- 2 max count per 100 grains.

With pink staining detected in the 2016/17 harvest, we believe a low level tolerance of pink stained grain should be allowed in feed grades, provided it is not fungus affected. Due to the association with fusarium, pink grains are widely not accepted in international markets and only a low level should be considered so international trade is not jeopardised.

**4.4 Stained, Pink Stained, White Grain Disorder/Head Scab/Flaked Grain – Wheat**

The removal of ‘of which’ classification in stained wheat is supported. This may be viewed as a loosening of the standards but data analysis of past receivals indicate that the number of loads upgraded to milling will be low and insignificant to stack averages.

We also suggest that the standards committee investigate the removal of ‘of which’ in the barley standard for Dark Tipped and Field Fungi / Heavily Discoloured. As with wheat, data analysis of past receivals indicate that some barley loads will be upgraded to malt but these are relatively few and insignificant to stack averages.

Removing ‘of which’ in both wheat and barley allows for better interpretation and consistency of the standards.

In addition to feedback on specific items in the member’s update, we would like GTA to consider increasing the maximum protein for malting barley to 12.5%. There have been some ongoing comments from clients and end users around low protein and Viterra sees merit in the industry considering a 0.5% rise in protein in an effort to increase protein stack averages.



Thank you for taking the time to consider our feedback. If you wish to discuss any parts of our submission, please don't hesitate to contact me.

Yours sincerely,

A handwritten signature in blue ink that reads 'Julie O'Dea'. The signature is written in a cursive style with a large, looping initial 'J'.

Julie O'Dea  
Senior Manager Inventory Control