



**Grain Trade Australia
2015-16 Standards Review
1st Call**

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NSW Farmers' Association Background

The NSW Farmers' Association (the Association) is Australia's largest State farmer organisation representing the interests of its farmer members – ranging from broad acre, Livestock, wool and grain producers, to more specialised producers in the horticulture, dairy, egg, poultry, pork, oyster and goat industries.

Summary of Recommendations

Part 1 Development of grain standards

- GTA should formalise a set of criteria for the development of standards that include the following criterion:
 - That the standard will facilitate trade
 - That the change is objectively linked to customers' functional needs
 - That comparisons between Australian standards and methodologies and that of competitors are objectively made
 - That the change will provide a net economic gain to the value chain and in particular to farmers.
- That the process for developing standards includes full disclosure of empirical information relating to the assessment criteria for the consideration of a proposed amendment.

Part 2 Agreed changes for adoption in the 2015-16 season

- NSW Farmers opposes the inclusion of the proposed amendments to the weed seed categories and tolerances into the cereal trading standards.

Part 3 Potential changes for 2015-16 season

Section 7 Sorghum Standards

Commencement

- NSW Farmers continues to support 1 October as the commencement date for sorghum standards.

7.1 Grades

- NSW Farmers is not opposed to the rationalisation of feed sorghum grades to SOR1 and SOR2.
- That the GTA Sorghum Standard should be renamed "Feed Sorghum Trading Standards".

7.2 Total Admixture, Foreign Material, Screenings and Trash

- NSW Farmers supports maintaining the previous removal of the Total Admixture tolerance.
- NSW Farmers opposes the proposals to remove the Trash tolerance and reduce the tolerance for Foreign Material in the SOR1 and SOR2 grades.
- NSW Farmers opposes reducing the tolerance for the screening tolerance in the SOR1 and SOR2 grades.

7.3 Total Defectives

- NSW Farmers does not oppose the proposal to reduce the Total Defective Grains tolerance from 10% to 5% subject to the following conditions:
 - The removal of the Stained standard from the Defective Grains definition.
 - The removal of Sprouted from the Total Defective Grains count.
- NSW Farmers supports the removal of all references to Stained from the standard.
- NSW Farmers supports the proposal to amend the definition of Sprouted grain by removing the reference to '*split the germ*'. NSW Farmers believes more evidence on the proposed criteria for adopting a standard is required prior to developing a position on the proposal to reduce the tolerance of Sprouted grain tolerance contained within COR1 from 5% to 3%.
- NSW Farmers is not opposed to the proposed reduction of the Field Fungi tolerance contained in SOR1 from %5 to 3%.
- Prior to developing a position on the proposal to reduce the tolerances for Heat Damaged/Bin Burnt and Storage Mould, NSW Farmers believes more evidence on the impact of the proposal against the criteria proposed in Part 1 is required.

7.4 Foreign Seed Contaminants

- NSW Farmers opposes the proposed introduction of the Weed Seed Review into the sorghum standard.

7.5 Ergot

- NSW Farmers does not support the proposed reduction of the tolerance for Ergot to 0.05% by weight of a half litre.

7.6 Sand and Soil

- NSW Farmers does not oppose the proposal to utilise a percentage weight tolerance for sand and soil in the sorghum standard; however believes that more evidence regarding the impact of the change should be provided to industry to enable further debate prior to any amendment.

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Part 1. Development of grain standards

NSW Farmers' policy on the implementation of standards for the grains supply chain, including technical and commercial standards, seeks:

- that standards are set by a suitable independent body;
- that changes to grain technical standards include a value assessment of the on-farm impacts;
- the use of standardised objective measurement for all types of quality parameters;
- that international standardised methodologies for the measurement of grain quality be adopted in Australia; and
- the uniform application of receival standards, including uniform calibration of testing equipment and training of personnel in grain standards and equipment operations.

These policies have been determined by NSW Farmers' grass roots membership, at its Annual Conference, reflecting concerns that Grain Trade Australia's (GTA) development of supply chain standards has not adequately taken into account the needs of grain farmers.

This submission will make comment on improvements that NSW Farmers believes should be made to the GTA Standard setting process prior to discussing the a number of the agreed and proposed changes.

GTA's role in setting commodity standards

NSW Farmers notes that the development and review of commodity trading standards is central to the core purpose that GTA provides to the grain value chain. Specifically the development of trading standards assists GTA to meet its objectives of promoting the '*interests*' of participants within the grain value chain on a national basis as well as the '*harmony and good relations*' between stakeholders in the value chain.

GTA has espoused the vision and values that guide how it implements its role in the development of commodity standards as part of its strategic directions document. These include:

- delivering products and services that add value to members' businesses and the facilitation of trade; and
- a commitment to working cooperatively with all parts and service all members of the value chain.

With specific reference to GTA's commitment to continually review its products that facilitate trade, its Strategic Direction commits to engaging in a development process that is transparent and inclusive. This highlights a process in which the relevant committee or organ of GTA will consider submissions from all individuals/organisations with a vested interest in the grain supply chain and make consensus recommendations to the Board of GTA.

These values are further fleshed out in the *Guide to the GTA Grain Standards* which establishes a number of objectives in GTA's standard setting function. These include:

- Inclusiveness in the formation of standards with input from across the value chain from plant breeding to domestic consumers and exporters;
- Ensuring standards that are easy to interpret and apply;
- Meeting the needs of commercial trade and customer requirements; and
- Utilising objective testing wherever practical.

The Guide also outlines a range of non-inclusive factors are to be taken into account in the development of a commodity standard. These particularly include:

- Available quality of grain given the restrictions of varieties, growing and harvesting conditions, pest and disease resistance of the crop;
- Customer and importing country requirements;
- Food safety laws;
- Competitor grades and quality; and
- Ability of storage systems to segregate or commingle grain.

Criteria for making and revising commodity standards

Due to the range of factors that drive the development of commodity standards by GTA, in many situations there will be competing objectives that will firstly need to be considered and then balanced in the development of the final standard. As a result informed debate between the different stakeholders around the impacts of potential final settings is required to ensure that the final standard progresses GTA's overarching objectives for establishing standards.

Therefore to ensure that the process enables GTA to meet its company objectives to promote harmony and good relations between members of the value chain, this debate needs to be driven by available evidence of the impact of current standards and proposed amendments to standards. This information should be provided against a formalised set of criteria for adopting or amending a standard. The criteria should include:

- **That the standard will facilitate trade.**
- **Customer demand and the linking of this demand to the impact of the specific proposed change to functional end-use needs;** such as empirical evidence about the impact of the test parameter on end use functionality whether for milling or stock feed. The evidence required should specifically link the parameters contained within the standard to the end use; for example feed standards (whether sorghum or barley) should not be required to meet the requirements of human consumption standards.
- **True comparison of Australian standards and methodologies against competitor standards** where the relevant competitor standard is the driving factor behind a proposal. This should be based on empirical evidence that either exists in existing industry/knowledge literature or alternatively from commissioned trials.

- **Net economic gain to the value chain and in particular to farmers.** This requires a weighing up of evidence about:
 - Improvement in the market for the commodity, including increased volumes and/or increased value arising; and
 - reduced costs within the supply chain (eg reduced time to sample grain at delivery and therefore increased turnaround time for trucks undertaking harvest deliveries);

against

- the practicalities and costs associated with producing and delivering grain against the current standard and any proposal;
- the cost borne by producers as a result of load rejection or downgrading as a result of the implementation of a proposal.

If on the balance, the increased value flowing to the farm sector as a result of the proposed standard does not outweigh the increased costs of production or risk of downgraded/rejected loads, the proposed amendment should be rejected. Proposed tightening of standards should not be made merely because there is evidence that it can be met by the farm sector.

Rather amendments to the standard that make imposition upon farmers must be related to an increase in value flowing to the farm gate as a direct result of the amendment.

NSW Farmers recommends that the criteria be formalised within the Charter for the Standards Committee and circulated to industry as part of the annual review of standards.

Greater transparency is required in development and review of GTA Standards

While GTA has committed itself to transparency through its annual standards review process, through publishing the two calls for submissions and the resultant submissions received, this does not provide the level of transparency NSW Farmers is proposing. The example of the proposed agreed changes to weed seed tolerances, outlined in greater detail below, provides an example of this.

Without a fuller level of disclosure, GTA continues to risk the legitimacy of decisions it makes where amendments to standards that are considered detrimental to producers. On this basis, NSW Farmers believes that all trial data and other evidence supporting or opposing proposed changes should be included as a standard component of all consultation phases associated with reviewing the standards. Importantly for farmers this would enable the development of an assessment of the value of on-farm impacts of any proposed change.

Part 2. Agreed changes for adoption in the 2015/16 season

Weed seed categories and tolerances – all cereals

NSW Farmers reiterates the opposition to the inclusion of the proposed amendments to the weed seed categories and tolerances into the cereal trading standards that it made in 2014.

In making this reiteration, NSW Farmers notes that the trial data that GTA collected as part of reviewing the standard has not been made available for public discussion. A specific request for the disclosure of this data was made by NSW Farmers as part of its submission to GTA's initial call for submissions in its 2014 Standards Review. A response that provided this data was not forthcoming from GTA; who instead opted to direct argument to that of form, concentrating on the process undertaken in the weed seeds review.

In the view of NSW Farmers it would have been preferable for GTA to provide the data that would have the capacity to deal with the substantive concerns that its farmer members hold over impact on load downgrades. The failure further meant that industry has not been able to consider countervailing factors such as improved value or reduced costs arising from faster sampling. Such an approach would have allowed for the transparent consideration of the proposal as articulated within GTA's Strategic Directions document and would have also further engaged representatives of the agriculture industry and the agronomic service industry.

NSW Farmers has attached its relevant submission from 2014 to outline the concerns over the proposed changes to weed seed tolerances.

Part 3. Potential changes for 2015-16 season

Sorghum Standards

Commencement

NSW Farmers continues to support the commencement of the sorghum commodity standards from 1 October. This provides industry with time to consider issues that arise during the previous season's harvest, which is still predominantly underway during the annual review window utilised by GTA for cereal crops. The issue surrounding the interpretation of the Stained tolerance in the Liverpool Plains of NSW in 2014 and the timely reaction from GTA to investigate and make changes to the standard as a result of its consultation with industry demonstrates the importance of the later commencement date.

7.1 Grades

NSW Farmers does not object to the rationalisation of feed sorghum to two grades, being SOR1 and SOR2. This position is made noting NSW Farmers support for the use of

regional off-grades based on the specific quality parameters where crops in that region are adversely impacted by weather or other factors.

However, NSW Farmers does oppose the proposed tightening of parameters contained within the SOR1 and SOR 2 grades, particularly Foreign Material, Trash and Screenings.

Further, NSW Farmers does not support the development of a human consumption grade for sorghum, believing that the trade has the ability to create specialty grades where it has identified market opportunities that will create premiums for grain producers.

Presently it appears that the only end users seeking a human consumption grade are Chinese purchasers acquiring sorghum for distilling *baijiu*. As such it is appropriate that the standard continue to focus on the needs of the major users of sorghum; being the domestic feed market or the Japanese, New Zealand and Chinese feed markets. The rationale behind this position has been more thoroughly canvassed in NSW Farmers' submission to GTA in June 2014.

To provide the market with further clarity as to the underpinning basis of SOR1 and SOR2 grades, NSW Farmers recommends that the standards be renamed 'Feed Sorghum Trading Standards'.

7.2 Total Admixture, Foreign Material, Screenings and Trash

NSW Farmers supports the decision taken in the gazettal of the 2014-15 sorghum standards to delete the Total Admixture parameter within sorghum grades, noting that each of the components of Admixture are individually assessed under the standard.

However NSW Farmers strongly opposes the proposal to remove the specific tolerance for Trash and the concurrent tightening of the Foreign Material tolerance without the provision of further empirical evidence to support the proposals. In order to sustain the argument that the proposal should be amended, this evidence should meet the relevant criteria for amending standards that NSW Farmers has proposed in the first section of the submission.

There are also concerns with the proposal to reduce screenings without the provision of more detailed evidence of the case for change to industry.

Table 1 outlines the proposed changes to the three tolerances within the SOR1 and SOR2 standards.

Table 1: Foreign Material (FM), Trash and Screenings

% by weight	SOR1		SOR2	
	Current	Proposed	Current	Proposed
Foreign Material	4	2 (includes material presently defined as Trash)	4	4 (includes material presently defined as Trash)
Trash	5		15	
Screenings	11	10	25	20

7.2.1 – 7.2.2 Trash and Foreign Material

As demonstrated in Table 1, the proposed changes to Foreign Material and Trash will dramatically tighten the standards for the delivery of both SOR1 and SOR2. This is through both the redefinition of Trash as Foreign Material, while at the same time reducing the tolerance for Foreign Material from 4% to 2% for SOR1 and maintaining the SOR2 tolerance at 4%. This is a real decrease of 7 percentage points for SOR1 and 15 percentage points for SOR2. On face value this change encompasses likely losses of value to grain producers as a result of sorghum deliveries not meeting the new standard.

In particular, NSW Farmers is concerned that the proposal creates a cliff-face pricing regime; this will result in a lower willingness of grain producers to forward sell their crop due to the uncertainty likely to be created by changes to standards that have served the industry well for many years. This means that it is likely that the proposal will actually hinder efficient trade, rather than facilitate it.

Market Requirements

NSW Farmers notes that the paper prepared by the Standards Committee makes the assertion that the new tolerance of 2% for Foreign Material (including material presently defined as Trash) for SOR1 has been proposed to 'reflect market requirements'. NSW Farmers is aware that one sorghum trader based in the Liverpool Plains has disputed the need to push to the tighter specifications proposed; casting doubt on the assertion relied on within the paper.

Given the comments made in the paper with regard to USDA methods for assessing sorghum, it is likely that the assertion seeks to make the comparison between the USDA grades of sorghum as reflecting the requirements of the market. It is the position that this should not be accepted without further critical analysis.

For example, the USDA standard for sorghum does not define unthreshed kernels as being foreign material.¹ In comparison such unthreshed kernels would be presently classified as Trash; and therefore Foreign Material under the proposal.² Furthermore, the USDA and Australian methods for assessing foreign material are different; therefore NSW Farmers believes that significant further investigation is required prior to using the USDA Sorghum No. 2 as the basis of amendments to the GTA sorghum standards.

While the above example outlines an areas in which there is differentiation between the two specifications, NSW Farmers also believes that the proponents of the change should carry the burden of explaining the objective basis upon which they believe the change is necessary to meet market requirements.

¹ USDA, *Grain Inspection Handbook*, Book II, Chapter 9 'Sorghum', [9 -14].

² GTA standard definition

Controlling Trash and Foreign Material at harvest

Further, NSW Farmers is concerned at the assertion that the issue of Trash, and therefore Foreign Material under the proposal, in the sample is a matter that is *readily controlled through the harvest process*. This is an oversimplification of the separation processes during harvest and the impact of environmental conditions under which harvest is being undertaken and physiological properties of the crop being harvested on these processes. Harvester settings that may result in the greater control of trash is likely to be taken at the expense of reduced harvesting efficiencies in terms of slower harvesting, increased losses over the separating system and increased screenings.

NSW Farmers also observes the comment in the paper that the Standards Committee has considered an analysis of deliveries and consignments in the development of the proposed amendments for consultation. In line with the position outlined in the first section of this submission, if this data and analysis is to be relied on in the standard making and review process it should be disseminated for public discussion during the consultation process. Further, as proposed in the introduction to the submission, merely because the standard is able to be met should not be considered a sufficient reason to amend the standard if there is not a resultant benefit in terms of increased value returned to the farm gate.

7.2.3 Screenings

As identified above, NSW Farmers does not support the proposed reduction in the tolerance for screenings; particularly in SOR2 but also SOR1. NSW Farmers believes that the paper fails to provide the necessary evidence required for industry to robustly debate its merits.

NSW Farmers acknowledges that the Standards Committee has indicated that it is seeking to mirror the USDA standards and that there are issues associated with the differences in the screens used in the different jurisdictions. With specific regard to the question posed within the paper on the suitability of screens to be used in the assessment of sorghum samples, NSW Farmers understands that the 2 mm slotted screen used under the GTA standard provides results in a higher level of screenings than the $\frac{5}{64}$ triangular-hole sieve prescribed by the USDA.

As such NSW Farmers believes that the Standards Committee should commission studies into the differences arising from the use of the different screens and the prescribed methodologies and disseminate the results to inform industry debate.

Beyond the issues relevant to the appropriateness of the different screens, evidence on the impact of the proposed change with regard to the value that is returned to the farm gate is required prior to further discussion on the proposed change. This should particularly include evidence relating to impact on the down grading or rejection of loads and any beneficial market factors. If the evidence for both SOR1 and SOR2 does not result in increased value returning to the farm gate the proposals should be dismissed.

7.3 Total Defectives

As acknowledged above, NSW Farmers commends GTA for the work it undertook in investigating issues arising out of the 2014 sorghum harvest in the Liverpool Plains of NSW and making appropriate adjustments to the standard in line with the evidence available. The majority of this work was done looking at the tolerance for Stained, Field Fungi and Total Defective Grains.

As a result of this engagement, NSW Farmers does not oppose the proposal to reduce the Total Defective Grains count for SOR1 from 10% to 5% subject to the following conditions:

- The removal of the Stained standard from the Defective Grains definition.
- The removal of Sprouted from the Total Defective Grains count.

Table 2 Defective Grains

% by count except where indicated	SOR1		SOR2	
	Current	Proposed	Current	Proposed
Total Defective Grains	10 ^α	5 ^β	20 ^α	25 ^β
Sprouted	5	3	10	10
Field Fungi	5	3	10	10
Sappy, Frost Damaged, Insect Damaged	5	No sub-tolerance	10	No sub-tolerance
Heat Damaged/Bin Burnt (% by weight)	0.6	0.5 ^γ	0.6	1 ^γ
Storage Mould (% by weight)	0.05	0.05 ^γ	0.05	1 ^γ

^α 2014-15 Total Defective Grains includes Stained, Field Fungi, Sprouted, Sappy, Frost Damaged, Insect Damaged

^β 2015-16 Total Defective Grains includes Field Fungi, Sappy, Frost Damaged, Insect Damaged, Heat Damaged/Bin Burnt and Storage Mould

^γ In 2015-16 it is proposed to amend the methodology for the assessment of Heat Damaged/Bin Burnt and Storage Mould tolerances from % by weight of the 300 grain sample to % by weight of a 0.5 L sample.

7.3.1 Stained

NSW Farmers supports the proposal to remove all references to Stained grain from the standard, noting that the standard is a feed sorghum standard and evidence from feed consumers that indicates staining has no nutritional effect on value of sorghum in the diet.

NSW Farmers observes that as part of the discussions industry undertook in considering the issues in the Liverpool Plains of NSW in 2014 it was considered that the presence of Stained grain did not meaningfully impact the value of sorghum as a feed grain. As such, the inclusion of the Stained definition within the standard serves no purpose as an indicator of the quality of feed sorghum and should be removed.

As outlined above, NSW Farmers is aware of niche markets for uses other than feed, such as the distilling of *bajju*; however believes that the ability for the trade to create speciality off grade segregations continues to be the most appropriate means of servicing these market demands.

7.3.2 Sprouted

NSW Farmers supports the proposal to amend the definition of Sprouted grain by removing the reference to '*split the germ*'.

Prior to developing a position on the proposal to reduce the tolerance of Sprouted grain tolerance contained within SOR1 from 5% to 3%, NSW Farmers believes more evidence on the impact of the proposal against the criteria proposed in Part 1 is required.

7.3.3 Field Fungi

As outlined above NSW Farmers is aware of the discussions with industry facilitated by GTA that investigated the impact of Stained and Field Fungi as indicators over the quality of sorghum as a feed grain. On the basis of this understanding NSW Farmers is not opposed to the proposed reduction of the Field Fungi tolerance from 5% to 3% for SOR1; however believes that for the purposes of increased transparency, data relating to the impact of the presence of Field Fungi on the quality of feed should be provided to industry.

7.3.5 – 7.3.6 Heat Damaged/Bin Burnt and Storage Mould

Prior to developing a position on the proposal to reduce the tolerances for Heat Damaged/Bin Burnt and Storage Mould, NSW Farmers believes more evidence on the impact of the proposal against the criteria proposed in Part 1 is required.

7.4 Foreign Seed Contaminants

NSW Farmers opposes the proposed introduction of the recommendations of the Weed Seed Review in the terms expressed in Part 2 of this submission.

7.5 Ergot

NSW Farmers does not support the proposed reduction of the tolerance for Ergot to 0.05% by weight of a half litre. NSW Farmers is concerned at the potential impact that this will have to farm gate value due to the increased likelihood of downgrading/rejection of loads. In line with the approach advocated by NSW Farmers to ensure a transparent and informed decision making process, evidence with regard to the impact of the

presence of Ergot in grain being used for livestock feed and likely impact on farm gate value should be developed and disseminated.

With regard to the paper’s rationale that the 0.05 % should be applied on the basis that this is the tolerance applied in Codex, NSW Farmers submits that the purpose of Codex is as a food standard with the aim of *‘protecting consumers’ health and ensuring fair practices in the food trade’*.³ Given that SOR1 and SOR2 are feed grades, NSW Farmers questions the application of a human food safety standard.

Further, in consideration of the impact of the presence of Ergot on the value of sorghum grain for livestock feed, NSW Farmers understands that SOR1a was developed to provide a sorghum feed grade with reduced levels of Ergot; and that it has predominantly been used by cattle feedlots in Queensland. As such, *if* a reduced level of Ergot is to be considered in the sorghum standards, NSW Farmers advocates that it be set at 1% similar to that used in SOR1a.

Table 3 Ergot

% by weight 0.5 L	Current		Proposed	
SOR1	Sorghum Ergot	0.3	All Ergot	0.05
	All other Ergot	NIL		
SOR1a	Sorghum Ergot	0.1	Grade Removed	
	All other Ergot	NIL		
SOR2	Sorghum Ergot	0.3	All Ergot	0.05
	All other Ergot	NIL		

7.6 Sand and Soil

NSW Farmers does not oppose the proposal to utilise a percentage weight tolerance for sand and soil in the sorghum standard; however believes that more evidence regarding the impact of the change should be provided to industry to enable further debate prior to any amendment.

ENDS

³ Codex Alimentarius Commission ‘Procedural Manual (Twelfth Edition, Joint FAO/WHO Food Standards Programme) 28.

Appendix A - Weed Seed Submission 2014-15

The following has been extracted from NSW Farmer's submission in response to the First Call for Submissions in the 2014-15 GTA Standards Review

NSW Farmers opposes the inclusion of the proposed amendments to the weed seed categories and tolerances into the cereal trading standards.

In support of this opposition, NSW Farmers believes that the principles of the review have failed to include ensuring that the changes will not adversely impact on the value of Australian grain and in particular the value recouped by farmers.

Further, it is the belief of NSW Farmers that the proposed inclusion of the categories and tolerances as presented will fail to meet the principles that GTA has espoused as guiding the review process; particularly:

- 1.3 Weight where possible versus count
- 1.5 All weed seeds and tolerances must be defensible
- 1.8 Existing tolerances are not significantly altered.

As part of the industry consultation on the proposal for the amendment to the weed seed categories and tolerances within the standards, NSW Farmers requests GTA provide more detail about the phytosanitary requirements of Australia's export markets, as well as the standards utilised by competitor grain exporting nations. Also NSW Farmers recommends that GTA receive agronomic advice from expert sources as to the prevalence of different weed seeds and whether the impact of growing herbicide tolerance will impact on the proposal.

NSW Farmers also request that the second call for submissions be associated by an assessment of the impact of adopting the proposed categories and tolerances upon the value recouped by the agriculture industry.

Weight where possible versus count

NSW Farmers is aware that in the 2011/12 Weed Seed Review Industry Consultation Paper, GTA put forward the practicality of identifying, segregating and weighing different weed seeds as a reason for the retention of the count sampling method for the vast majority of weed seeds included within the standards.

In response to the proposed inclusion, NSW Farmers notes that the identification of weed seeds will remain the same, whether the sampling process is undertaken by count method or weight. With regard to the proposed time taken for segregating and weighing identified weed seeds, NSW Farmers believes that prior to being able to make a determination that this was unpractical GTA should have:

- Undertaken a trial of the proposed procedure using both the count and the weight methodologies to examine the respective time taken to sample using both methodologies.
- Undertaken a cost benefit analysis on the basis of whether there is a value returned to farmers as a result of retaining the count methodology as opposed to the weight methodology.

A determination that the process is unpractical should only be taken at the point at which it is determined to not return net value to farmers.

Weed Seeds and tolerances should be defensible

This will be dealt simultaneously with the issue of altering of tolerances.

Table 1: Milling grades and malt barley

Category		Existing Tolerance		Proposed Tolerance	
A	Type 2 Castor Oil Plant, Coriander, Crow Garlic/ Wild Garlic, Darling Pea, Peanut seeds and pods, Ragweed, Rattlepods, Starburr, St. John's Wort	Nil		Nil	
	Type 1 Opium poppy	8 ⁴			
B	Type 3a Bathurst Burr, Bulls Head/Caltrop/Cats Head, Cape Tulip, Cottonseed, Dodder, Noogoora Burr, Thornapple	2		5	
	Type 3b Vetch (Tare), Vetch (Commercial)	4			
	Type 3c Heliotrope (Blue), Heliotrope (Common)	8			
	Type 6 Colombus Grass, Johnson Grass,	10			
	Type 1 Double Gees/Spiny Emex/Three Cornered Jack, Parthenium weed	8 ¹			
C	Type 1 Jute, Knapweed (Creeping/Russian), Mexican Poppy	8 ¹		10	
	Type 6 Saffron Thistle	10			
D	Type 4 Bindweed (Field), Darnel (Drake Seed), Hexham Scent/Meliot, Mintweed, Nightshades, Paddy Melon,	20		30	
	Type 5 Patterson's Curse/ Salvation Jane	40			
E	Type 7a Broad Beans, Chickpeas, Corn (Maize), Cowpea, Faba Beans, Lentils, Lupins, Peas (Field), Safflower, Soybean, Sunflower and any other seeds greater than 5mm in diameter	1		1	
F	Other weed seeds Includes black oats	Malt	Mill	Malt	Mill
		50	50	25	50

⁴ Component of Type 1 tolerance.

Existing tolerances are not significantly altered

Table 1 seeks to organise the proposed categories of weed seed against the existing “types” presently used in GTA’s trading standards in milling wheat and malt barley by way of example. This shows a substantial reduction in the allowed weed seeds, both in the reduction in the number of clusters over which tolerances had been established, and a reduction in category tolerance for most weed seeds as against the existing type tolerance.

As a result, and in lieu of a more detailed value assessment, NSW Farmers questions the impact that this change will have on farm gate value of grain. Furthermore, there does not appear to be a defensible explanation for the reduction of these tolerances.