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21 June 2024

Joint Standing Committee on Investment & Growth PO Box 6021 Parliament House CANBERRA ACT 2600

Attention: Committee Secretariat – Via email to jsctig@aph.gov.au

Re - Inquiry into the Understanding and Utilisation of Benefits under Free Trade Agreements

Submission from Grain Trade Australia

1.0 About GTA

Grain Trade Australia (GTA) is a national association and is the focal point for the commercial grains industry within Australia. The role of GTA is to provide a framework across Industry to facilitate and promote the trade of grain. GTA facilitates trade and works to provide an efficient, equitable and open trading environment by providing leadership, advocacy, and commercial support 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 Trading Standards and/or Trade Rules.

GTA has established the Australian Grain Industry Code of Practice. All GTA Members are required to adhere to the Code of Practice. GTA Members are drawn from all sectors of the grain value chain from production to domestic end users and exporters. GTA has over 280 organisations as members. Their businesses range from regional family businesses to large national and international trading/storage and handling companies who are involved in grain trading activities, grain storage, processing grain for human consumption and stock feed milling. A list of GTA Members is here and attached.

GTA welcomes the opportunity to make this submission to the inquiry into the understanding and utilisation of benefits under Free Trade Agreements (FTAs).

2.0 Introduction

The Australian grain industry¹ is a major economic contributor in regional Australia and to export revenue, with annual value of production in 2022/23 forecast (excluding rice) to be a record \$33 billion at the farm gate and \$31.3 b of exports², meaning the grain industry is the highest value industry in the agriculture sector, contributing more than 33% of Australia's agricultural gross value of production annually.

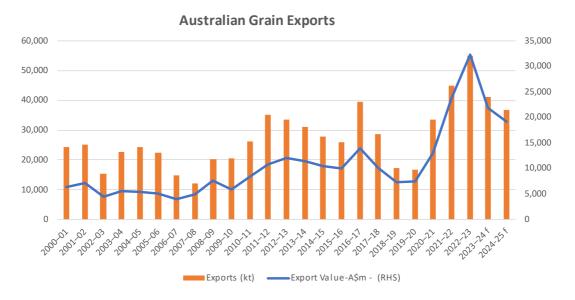
The industry achieved record summer and winter production in 2022/23 at 73.6 million tonnes following two prior large crops with 2021/22 a 68.0 million tonne crop, and 59.9 million tonnes in 2020/21.

Trade is vital for the Australian grain industry and regional communities, with the Australian grain industry being highly export oriented e.g., 65 -75% of grain is exported. The Australian grain industry is well positioned to supply markets especially into regions such as south east Asia.

¹ Grains include wheat, coarse grains, oilseeds, oilseed meals and pulses

² Source: ABARES, 2024

Figure: 1 Australian Grain Exports



GTA supports the establishment of Free Trade Agreements (FTAs) for many reasons. FTAs present a unique opportunity to deepen and strengthen trade and economic ties with our trading partners and their countries. Especially those that are significant markets for a range of cereal grains, oilseeds, oilseed meals and other grain products.

FTAs have the potential to significantly grow the trade of Australian grain and can also contribute positively to our trading partners food sector. The proximity, population and growing purchasing power of Australia's markets create new opportunities for Australian agricultural exports, particularly grain.

Increasing existing and opening new export market opportunities for Australian grain and products and reducing distortions in global markets are **key priorities** for the industry.

GTA consider successful bilateral agreements can provide a significant increase in export value to the Australian grain industry. However, growth in viable opportunities will require any existing and any new FTAs to deliver commercially meaningful gains in market access.

To maximise these market access opportunities, ongoing reform of both tariff and non-tariff barriers to trade is required. Non-tariff barriers remain an impediment to the international trade of grain and any trade agreement must include a focus on the development and implementation of a **systematic approach** to addressing any barriers.

FTAs will potentially boost opportunities for the Australian grain industry and support growth, development and trade opportunities for its trading partners across many sectors.

3.0 Grain Industry Market Factors

Australian industry participants and especially its exporters are fully exposed to a sophisticated global commodity market for grain that is competitive, efficient, and transparent.

Consequently, the determination of the key export markets for Australian grain is based on sound economic and commercial principles including price, volume and quality. The underlying market forces and exporters' financial objectives generally promote the concentration of export **sales into premium markets**. It can be argued this may lead to a reliance on a few key markets, with the associated risk and exposure for Australian exporters and grain value chain participants.

Grain marketing is a relatively mature and sophisticated discipline. Individual company marketing strategies would consider opportunities to diversify and to minimise key market risks. However, the development and building of volume in new markets can be a lengthy and expensive process and cannot detract from the ongoing business of satisfying customers in key existing markets whilst minimising financial risk and exposure to the exporter.

The Australian export of malting barley to China that has undergone recent tariff impositions is an example of a market that was developed over multiple decades leveraging growth and changes in China's consumption and market buying capability. This market is an example where the Australian industry engaged and developed malting barley varieties specifically for the needs and requirement of the Chinese malt sector. It is pleasing to see the tariff situation is now resolved, and barley exports have resumed with over 4.2 million tonnes exported so far in the 2023-24 season.

4.0 The Value of Bilateral Trade Agreements

International trade of agricultural products is highly exposed to political and trade machinations.

Whilst underlying economic market forces drive trade, the impact of importing country policies can influence and distort markets in several ways such as:

- limiting market access opportunities, and
- increasing transaction costs and risks (for importers and exporters).

The economic and opportunity costs of these distortions are ultimately borne by producers and consumers.

Foreign government policy and actions such as trade distorting non-tariff measures (NTMs) may present challenges for exporters to address on an individual basis. Joint industry and government initiatives including bilateral trade agreements go some way towards minimising the scale and the impact of distortions caused through trade policy.

GTA supports bilateral trade agreements and consider them an **effective trade policy tool**. GTA acknowledges the achievements of Governments in both regional and bi-lateral trade agreements. We believe it is important these trade agreements continue to remain in place to:

- provide a framework for trade, and
- continue to focus on improving market access, and
- reduce the impact of NTMs, and
- foster tariff reductions.

Clearly, the nature of a trading partner's political and regulatory frameworks has a large bearing on the effectiveness of trade agreements.

GTA believes that, in addition to the bi-lateral approach, a **multi-lateral approach** to trade policy arrangements also serves an important role in efficient trade facilitation. International bodies such as the World Trade Organisation (WTO) and the International Plant Protection Convention (IPPC) serve important roles and functions to provide a rules-based global trade framework, which facilitate trade and provide confidence to markets. At a regional level, bodies such as APEC and ASEAN, provide opportunity for multi-lateral forum and dialogue to progress common trade policy and facilitation issues in open and transparent forums.

5.0 Grain Industry Experience with FTAs

GTA and the grain industry place a high importance on trade support through FTAs and has a long history of working collegiately with Government to maximise the benefits and value from FTAs.

GTA supports and promotes:

- 1. A balanced approach to **strategic trade policy** as it is critical for the grain sector.
- 2. A focussed **joint industry and Government** approach to effectively counter any negative impacts of trade policy and regulation that unnecessarily distort markets and efficient trade.
- 3. **Bi-lateral and multi-lateral approaches** to trade and trade agreements that provide benefits to industry through a rules-based approach to trade.
- 4. **Technical based dialogue and agreements** as "tools" to address NTMs that can distort markets and reduce efficiency by increasing costs and risks for exporters and importers. GTA's view is that continued and greater focus on these "tools" will improve the facilitation of trade.
- 5. **Trade and economic partnership agreements** which provide mechanisms to gain and improve market access, which will assist in diversifying market opportunities for industry.

6. Increasing awareness and understanding among stakeholders, particularly policy makers, that the economic value of Australian industry is dependent on more than trade. In addition to improving trade outcomes, **competitive advantage and value also needs to be driven by improving the efficiency of our supply chains.**

In recent years GTA has worked with Government on several FTAs and economic agreements and has provided feedback on the utilisation and benefits associated with each. A **summary** of recent GTA submissions and feedback follows in Table 1.

Table 1. GTA Feedback Via Submissions on Trade Agreements

FTA	GTA Submission	Submission Date	Key Points/Summary of GTA feedback
Numerous	Inquiry into the Australian Government's approach to negotiating Trade & Investment Agreements	20 September 2023	 Supportive of FTAs. Efficient implementation is key. Industry & Government partnership approach is essential.
Indonesia Australia Comprehensive Economic Partnership Agreement (IA- CEPA)	IA-CEPA value for the Grain Industry	14 December 2021	 Feed grain market access for Australian grain has been ineffective due to lack of Indonesian support for IA-CEPA. Implementation has not included a joint industry and government approach or recognised the long standing and positive existing relationship between the Australian grain industry and the Indonesian industry.
China – Australia Free Trade Agreement	ChAFTA Post- Implementation Review	20 August 2020	 ChAFTA has created value. Vigilance is required as ChAFTA has failed to prevent issues such as the AD/CVD barley tariffs. ChAFTA has also been largely ineffective in progressing a number of SPS issues to support improved trade facilitation and market access of grain products. A focus on improving supply chains through supply chain investment is also critical for competitiveness and growth.
Japan- Australia Economic Partnership Agreement (JAEPA)	Japan-Australia Economic Partnership Agreement (JAEPA) Post- Implementation Review	23 August 2019	 JAEPA provides access to a more efficient market process including the ability to export wheat and barley duty free and outside of a complicated quota system. Eliminated tariffs on wheat gluten and milled corn products. Eliminated tariffs for some canola and other vegetable oils. Requires continued focus to improve SBS arrangements and improved

FTA	GTA Submission	Submission Date	Key Points/Summary of GTA feedback
			quota allocations as well as a focus on NTMs such as MRLs and regulation around plant breeding innovation.

6.0 Non-Tariff Measures (NTMs)

International trade of agricultural products is performed in a complex commercial and political environment and as noted is highly exposed to political and trade machinations.

Importing country policies can influence and distort markets in several ways such as:

- limiting market access opportunities,
- increasing transaction costs and risks (for importers and exporters).

Foreign government policy and actions such as trade distorting Non-Tariff Measures (NTMs) may present challenges for exporters to address on an individual basis. Joint industry and government initiatives including FTAs go some way towards minimising the scale and the impact of distortions caused through trade policy.

GTA supports trade agreements that can be effective trade policy tools. GTA acknowledges the achievements of Governments in establishing trade agreements but note these have not always been effective in preventing or resolving the trade issues such as the recent barley China tariff and AD/CVD issues.

GTA believes addressing NTMs that are acting as impediments and barriers to efficient trade must be a priority of current and future trade policy.

While it should be noted that many NTMs serve legitimate purposes (such as protecting human, animal and plant health and the environment), some NTMs can impose trade barriers when applied in a manner that is not consistent with the principle that they should be no more trade-restrictive than necessary to meet a legitimate objective. NTMs have long been used by governments as policy and trade regulatory tools and have the scope to significantly increase the costs and risks of trade and impact on trade opportunities.

GTA has been a strong advocate in seeking to minimise the impact and disruption NTMs have on Australian exporters. Working with industry and the Department of Agriculture, Fisheries and Forestry (DAFF) GTA facilitated the production of a report on the impact NTMs have on the Australian grain industry. The NTM report is available here.

7.0 Supply Chain Investment for Competitiveness and Growth

In addition to market access and efficient trade, the future success of Australia's grain industry is dependent on an efficient and competitive supply chain. To this end GTA has developed an innovative growth and investment strategy for the grain supply chain called <u>Modernising the grain supply chain</u>.

Global competition is intensifying. The quality advantage for Australian grain is reducing as processers and consumers increase their efficiency and utilisation of grain from alternative and cheaper origins and utilise technology to enable flexibility and the use of different quality raw materials. This is applying pressure on Australian margins, and costs at both the farm and supply chain level.

Australia must compete and develop competitive advantage on both the grain quality/value and the supply chain fronts. To enhance the competitiveness of the Australian value chain both industry and government need to play a significant role in investing in the long-term future to increase productivity and reduce paddock and supply chain costs to ensure our market position and improve farm gate returns.

The grain value chain is reacting to global competition. The historical consolidated supply chain maintained by large bulk handling companies is evolving into a competitive mix of on-farm storage and commercial storage operators operating in an increasingly dynamic and entrepreneurial market.

The market is driving increases in storage capacity and the number of operators through multiple container packers, new ports, country storage operators and farm-based storage and logistical enterprises.

This increasingly competitive and spatially distributed storage model provides opportunity for participants including grain producers as they more than ever can extract and capture value from the post farm gate supply chain. However, whilst delivering benefit, a broad and competitive multi-operator storage model **does require guidance** and support and pre-competitive cooperation if Australia is to drive efficiency and maintain the well- deserved reputation in the world market, earned over many years.

GTA would contend that in seeking to develop policy to improve the position of Australian agricultural industry, trade is just one, albeit important policy consideration, and the other factors, such as the supply chain, should also be considered to improve competitiveness and extract economic value.

8.0 Conclusion

GTA supports FTAs as they present a unique opportunity to deepen and strengthen trade and economic ties with our trading partners. FTAs have the potential to significantly grow the trade of Australian grain and create new opportunities for Australian agricultural exports, particularly grain.

Increasing existing and opening new export market opportunities for Australian grain and products and reducing distortions in global markets are **key priorities** for the industry. However, for market access opportunities to be maximised requires the ongoing joint management of Government and industry relationships, successful implementation of FTAs and trade programs and the ongoing reform of both tariff and non-tariff barriers to trade.

Successful FTAs will boost opportunities for the Australian grain industry and support growth, development and trade opportunities for Australia and its trading partners.

We believe there are realistic opportunities for the Australian Government through a collaborative industry and Government approach to FTAs in support of growth in trade.

We thank you for the opportunity to make this submission. We request that you keep us updated on developments and progress in this important inquiry.

Please do not hesitate to contact GTA should you have any queries or should we be able to be of assistance.

Yours faithfully,

Pat O'Shannassy

CEO, Grain Grade Australia



Membership List as of 19 June 2024

mber Type	Member Level	Account Name	Primary Contact	Website
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		Viterra Australia	Philip Hughes	www.viterra.com.au
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	A3	Cargill Australia	Zsolt Kocza	www.cargill.com.au
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	A4	ADM Trading Australia	Darryl Borlase	www.adm.com
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		Bunge Agribusiness Australia	Stephen Bennett	www.bunge.com
		Louis Dreyfus Company Emerald Australia	David Johnson	www.ldc.com
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		George Weston Foods	Michael Schmidt	www.gwf.com.au
			Peter Sloan	
		Manildra Group		www.manildra.com.au
		Riordan Grain Services	Jim Riordan	www.riordangrains.com.au
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	B2	Centre State Exports	Jeff Voigt	www.centrestateexports.com.au
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		Cofco International Australia	Sarah Pan	www.cofcointernational.com
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		Robinson Grain Trading	Adam Robinson	www.robinsongrain.com.au
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	C1	Adams Australia Pty Ltd	Ian Mack	www.adamsaustralia.com.au
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		Agrisk (Market Check)	Brett Stevenson	www.marketcheck.com.au
		AGT Foods Australia	Michael Brittain	www.agtfoods.com/australia
		Associated Grain t/a Agrocorp Processing Australia	Russell Darbey	www.agrocorp.com.au
			Peter Webb	
		Australian Food & Fibre Processing		www.australianfoodandfibre.com.au
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	Rex James Stockfeed	Natasha Davies	www.jamesstockfeed.com.au
	Rivalea (Australia) Pty Ltd - Animal Nutrition	Andrew Philpotts	www.rivalea.com.au
	SunPork Farms Feed Mills	Mark Young	www.sunporkgroup.com.au
	ThriveAgri Pty Ltd	Charlie Brown	www.thriveagri.com
	TSS Grain (Tasmanian Stockfeed Services)	Trevor Macleod	www.tasstockfeed.com.au
	Unigrain Pty Ltd	Ervin Leong	www.unigrain.com.au
	Viridis Ag	Chris Reeves	www.viridisag.com
	W B Hunter Pty Ltd	Stewart Coombes	www.wbhunter.com.au
	Wilken Grain	Richard Wilken	www.wilkens.com.au
	Woods Grain Pty Ltd	Bruce Woods	www.woodsgroup.com.au
	XLD Commodities	John Tuskin	- '
			www.xldgrain.com.au
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C2	Access Grain Pty Ltd	Wade Humphries	www.accessgrain.com.au
	Aditi UVG	Harshad Kale	www.aditiuvg.com
	Aditya Birla Global Trading (Australia)	Surya Jain	www.abgtrading.com
	Advantage Grain Pty Ltd	Chris Nikolaou	www.advantagegrain.com.au
	Agmark Commodities	Richard Alcorn	www.agmark.com.au
	Agri Om Australia Pty Ltd	Kishore Bulchandani	www.agriom.com.au
	Agri-Oz Exports (Aust) Pty Ltd	François Darcas	linkedin.com/in/francois-darcas-4a440577
	Agromin Australia Pty Ltd	Rajni Patel	www.agromin.com.au
	Alliance Grains	Luke Walker	
			www.alliancegrains.com.au
	Arya Pulses Australia Pty Ltd	Aravindhan Ravindraraj	www.aryapulses.com.au
	A T Waterfield & Son Pty Ltd	Brad Waterfield	linkedin.com/in/brad-waterfield-8767869b
	Australian - Asian Agricultural Exports (AAAX)	Mick Connolly	www.aaax.ws
	Australian Choice Exports Pty Ltd	James Hunt	www.australianchoiceexports.com.au
	Australian Grain Storage	Matt Bailey	www.sunrice.com.au
	Australian Growers Direct Pty Ltd	Tyrone Stowers	www.ausgrowersdirect.com.au
	Australian Mungbean Company Pty Ltd	Damien White	www.australianmungbean.com.au
	A W Vater & Co	Kim Vater	www.vater.com.au
	Baker Grain	Richard Baker	www.bakergrain.com.au
	Boort Grain Co-Operative	Jon Bucknall	www.boortco-op.com.au
	Broun and Co Grain Pty Ltd	Charles Coventry	www.brounandco.com.au
	C & S Trading Pty Ltd	Craig Scholz	www.scholzbh.com.au
	Carpendale Agri Pty Ltd	Andrew Kluck	www.carpendale.com.au
	Carson Stockfeed Pty Ltd	John Carson	03 6634 7376
	Chester Commodities	Richard Black	www.chestercommodities.com.au
	C K Tremlett Pty Ltd	Andrew Tremlett	linkedin.com/in/andrew-tremlett-36a06385
	CL Commodities	Robert Lean	www.clcommodities.com.au
	Coorow Seeds		
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