

16th July 2024

Department of Agriculture, Fisheries and Forestry
 GPO Box 858
 Canberra ACT 2601

Email: exportsfunding@aff.gov.au

Re: Submission: Draft Policy Position Paper – Sustainable Funding – Annual Adjustments

Dear Sir/Madam,

Thank you for the opportunity to provide feedback into the Department of Agriculture, Fisheries & Forestry (DAFF) preferred mechanism for the annual adjustment of cost recovery fees and charges through indexation and annual review.

Grain Trade Australia (GTA) is a member of the DAFF Grain and Plant Products Export Industry Consultative Committee (GPPEICC). GTA is a national association and 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 drawn from all sectors of the grain value chain from production to domestic end users and exporters. GTA has over 285 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 attached.

As the exporters of grain from Australia, it is GTA members who directly pay for the grain export cost recovery (ECR) program.

1. DAFF Out of Sessions Paper – Key Issues

Firstly GTA would like to respond and make comment on the Key Issues outlined by DAFF in the Sustainable Trade Funding Taskforce Out of Sessions Paper. These are outlined in the following Table:

Issue #	DAFF Key Issue	GTA Feedback/Comments
1	The department is responsible for implementing cost recovery models which comply with the Australian Government Cost Recovery Policy (Australian Government Cost Recovery Policy). Models must be fit for purpose, meaning they adequately reflect the cost of delivering activities and services, and allow for appropriate adjustment over time.	GTA agrees with this objective and that models must be fit for purpose. However, we question why this is listed as an issue? GTA’s main concern with this objective is the lack of transparency in costs from DAFF for delivering service. GTA would also question the difference between activities and services, as services provided by DAFF should cover all activities conducted by DAFF for the export of grain and where costs are therefore recovered. Fit for purpose should also mean adequate minimum service levels.
2	The Sustainable Trade Funding Taskforce is developing policy positions to support a new funding model, including those policies that would be applicable to cost recovery.	This is a statement of intent. As above, transparency in the policy position that outlines the service provided and the underlying costs basis is vital. This is more reflective of “an issue” than the current statement.

Issue #	DAFF Key Issue	GTA Feedback/Comments
		Any policy positions developed should be fit for purpose (as defined above), focussed on driving efficiency, maximise industry's international competitiveness and minimise the cost burden on industry.
3	The draft policy position paper attached (Attachment A), outlines the department's proposal to annually adjust fees and charges each year based on Consumer Price Index (CPI), with an additional annual review process to ensure the fees and charges appropriately recover the cost of delivering cost recovered services. This methodology is consistent with that applied in the department's biosecurity cost recovery arrangements.	<p>This is also a statement of the department's intent.</p> <p>GTA would question the linkage and requirement for methodology for exports to be as per import biosecurity arrangements. Cost recovery should be based on service and reflective of industry needs (and government policy where applicable).</p> <p>This approach is of concern to GTA members as it is not efficiency based and guarantees increased revenues without a commensurate productivity gain from DAFF services. This approach also does nothing to address the under-recovery that has occurred in several DAFF programs. Addressing under-recovery is the key issue for this whole review.</p>
4	<p>The department, in its last review, reflected four forward years of price estimates in its pricing legislative instruments (the Export Charges (imposition-General) Regulations 2021 and Export Control (Fees and Payments) Rules 2021).</p> <p>a) This approach saw forward year prices set in legislation reflective of the modelled cost of our regulatory services at a point in time.</p>	<p>This process may have been an appropriate means of constructing the CRIS at the time.</p> <p>In the grain sector the method resulted in an over recovery at the end of the last financial reporting period of \$5.3m and a forecast closing over recovered balance at the end of the 2024-2025 financial period of \$3.8m which does not meet government and industry guidelines for the amount permitted under that policy. This over recovering reflects in part the inflexibility of this approach, noting that predicting agricultural production four years in advance will be inherently unreliable.</p> <p>The process requires review, in that on a frequent basis throughout those 4 years, annually a direct comparison with forecast figures could not be done given differing underlying assumptions for charges, changes in government sector cost basis, timeliness of reporting and at times, errors in reporting.</p>
5	<p>Under this current model, fees and charges were not adjusted each year beyond a historic modelled indexation rate, leaving the model inflexible to changes in economic pressures.</p> <ul style="list-style-type: none"> • This is evidenced by deficits incurred by export arrangements, collectively \$81.34 million over the five-year period 2018-19 to 2022-23. <ul style="list-style-type: none"> ○ By way of a practical example, inflationary impacts, originally modelled at 1.65% per annum, in line with then Department of Finance estimates did not hold true, peaking at 7.8% in December 2022. 	<p>The deficit of \$81.34m across the DAFF export arrangements requires review and pragmatic attention. GTA recommends DAFF should identify the programs and areas that are currently not sufficiently cost recovered and consistently run in deficit. These areas should be charged their costs, rather than seeking to recover or allocate costs to areas where excess cost recovery has historically occurred.</p> <p>Improved transparency across different programs (e.g. a "multi-program dashboard") should be available to all programs, to improve transparency. This will assist in identifying underfunded arrangements and inefficiencies.</p> <p>DAFF should also look to benchmark (both intra department, inter Government & to the commercial market) their services to demonstrate efficiency and effectiveness rather than just seeking to recover costs for what may be an inefficient service in some areas. It would also allow each program to</p>

Issue #	DAFF Key Issue	GTA Feedback/Comments
		<p>have differing charges, rather than a “one size fits all” approach that the issue infers.</p> <p>Regarding the modelled 1.65% inflationary figure used in the CRIS this was not unreasonable. Given, as stated in the 2024-25 CRIS the greater part of the department’s regulatory activity cost is employee related plus external suppliers and operating support for the DAFF export IT systems this figure of 1.65% appears appropriate.</p> <p>Further supporting this figure is the 2024-2025 CRIS states the wage price index (WPI) applied to DAFF employee expenses decreased from 2.0% to 1.7% per annum, reflecting reasonable estimates of wage increments in line with the Australian Public Service Workplace Bargaining Policy 2020.</p> <p>For the Grains program, the FY 23/24 forecast cost base of 14.1 million is in line with the CRIS forecast of 14.0 million. Therefore, applying CPI based annual increases alone to the fees and charges applied to the Grains program would likely lead to even greater over-recovery.</p>
6	<p>The proposed approach seeks to include a level of flexibility whilst still providing a measure of certainty for industry’s business planning needs. The proposed mechanism should enable the department’s export charges to reflect the commercial reality of changes in economic drivers, consistent with the impact of these drivers on commercial businesses in delivering their activities.</p>	<p>GTA acknowledges where delivery and thus costs alter, review is needed, and changes to services and/or charges made where required. However, this approach is somewhat ill considered from a Grain industry perspective. GTA supports engagement with industry in this current review to seek potentially reformative change that will drive an effective and efficient Government service partner while providing some degree of certainty of charges over time.</p>

2. Sustainable Funding – Annual Adjustment

2.1 Legislated Indexation:

The 2024-25 CRIS reports the greater part of the department’s regulatory activity cost is employee related plus external suppliers and operating support for the DAFF export IT systems.

GTA questions the relevance of why the department would seek to introduce a legislated indexation formula of appropriate cost elements including those of wages and inflation with the Consumer Price Index (SPI) at its base. This would in effect “hard code” an approach that may not truly reflect the departments actual costs for the cost recovered programs.

Given the majority of the regulatory cost is employee related cost the wage price index (WPI) applied to DAFF employee expenses could be more appropriate.

2.2 Annual Review of Changes in Activity

GTA notes the Department is considering an annual review process to be incorporated into the model to allow assessment, as needed, of the department’s cost base for delivering cost recovered services. Whilst this may be a practical and sensible objective this requires DAFF having an adequate and transparent accounts process that reflects the cost and revenue attributable to grain. Recent issues with the ability to accurately and timely report on its financial performance raises questions on these annual review processes. Whilst progress has been made the reported ‘forecast closing balance’ numbers in the current 2024-2025 CRIS are still inaccurate with a reported - \$3,591,128. The actual balance being \$5,342,000

The current headline numbers for the Grain sector are shown below

Table 5 Financial estimates for grain and seed exports cost recovery arrangement

Finance element	2022–23 (\$) ^a	2023–24 (\$) ^b	2024–25 (\$) ^b	2025–26 (\$) ^b
Revenue = X	17,098,308	14,185,937	14,439,098	14,439,098
Expenses = Y	14,012,952	14,035,690	14,255,777	14,479,605
Balance = X – Y	3,085,356	150,247	183,321	(40,507)
Appropriation funding	n/a	n/a	n/a	n/a
Balance after appropriation	3,085,356	10,247	183,321	(40,507)
Forecast opening balance	355,525	3,440,881	3,591,128	3,774,449
Transfer	3,085,356	150,247	183,321	(40,507)
Forecast closing balance	3,440,881	3,591,128	3,774,449	3,733,942

Note: numbers in brackets are negative. **a** Actual. **b** Forecast. **n/a** Not applicable.

An annual review process must be based on accurate accounts, and transparency. The department must be accountable as part of this process including transparency across its multiple Plant Export programs.

It is noted none of the many papers produced and provided to industry discuss in any way a process to **review and consider the cost base that is to be used as the starting point of proposed arrangement** across each export sector. Furthermore, there's also no mention of reviewing the volumes that are related to the revenue side of the equation. This must be addressed as the over-recoveries that have occurred in the Grains program have been the direct result of higher than expected revenues driven by volumes significantly exceeding forecasts.

Whilst the grain sector has over recovered several other sectors must have massively under recovered over the 5-year period 2018-19 to 2022-23 to amass a deficit of \$81.34m. There should be a review and a re-establishment of each sector's base annual cost and revenue.

If the base cost is undergoing a review GTA respectfully recommends a transparent review of Indirect Costs applied to the grain industry. Currently the percentage allocation of Indirect Cost for grain is 37%. This appears high in comparison to other sectors with DAFF especially as the grain export function is considered less complex and with higher volumes per export transaction than in other sectors.

GTA supports cost recovery as a mechanism to provide key services not covered through Government consolidated revenue, this is based on being provided with access to information and engagement with DAFF that provides satisfaction the **cost is balanced** by the provision of an effective and efficient service.

Greater transparency afforded through a **strategic benchmarking approach** should provide long-term benefits to industry and DAFF, resulting in potential cost savings to industry and a reduction in the overall budget of the Plant Export Operations branch responsible for provision of the regulatory function. These should be considered as a component of the review of a sustainable export funding model.

3. Conclusion

This Sustainable Funding review is welcomed on the basis it focusses on **economic efficiency rather than solely a focus on increasing** revenue to plug the reported financial shortfalls of the Department. In GTA's view it is critically important to consider the effectiveness and the application of the DAFF cost recovery model and the impact it has on the agricultural industry's efficiency.

Understanding the value proposition of the DAFF fees and services is important to GTA and it is proposed DAFF as part of the sustainable export funding model consider processes to monitor and measure DAFF's services in order to remain efficient and cost effective.

GTA consider such proposals to be aligned with the Government's strategy to grow agriculture industry value to \$100 billion by 2030.

Thank you for this opportunity to comment.

Please do not hesitate to contact GTA at any stage to discuss further.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'P O Shannassy'.

Pat O'Shannassy
CEO, Grain Trade Australia



GRAIN TRADE AUSTRALIA

Membership List as of 11 July 2024

Member Type	Member Level	Account Name	Primary Contact	Website
Ordinary Member	A1	CBH Group	Ben Macnamara	www.cbh.com.au
		GrainCorp Australia	Robert Spurway	www.graincorp.com.au
		Viterra Australia	Philip Hughes	www.viterra.com.au
			3	
	A3	Cargill Australia	Zsolt Kocza	www.cargill.com.au
			1	
	A4	ADM Trading Australia	Darryl Borlase	www.adm.com
		Arrow Commodities	Dominic Vanzella	www.arrowcom.com.au
		Australian Grain Export	Tim Martin	www.australiangrainexport.com.au
		Bunge Agribusiness Australia	Stephen Bennett	www.bunge.com
		Louis Dreyfus Company Emerald Australia	David Johnson	www ldc.com
			5	
	B1	CHS Broadbent	Steve Broadbent	www.broadbentgrain.com.au
		ETG Commodities	Peter McMeekin	www.etgworld.com
		George Weston Foods	Michael Schmidt	www.gwf.com.au
		Manildra Group	Peter Sloan	www.manildra.com.au
		Riordan Grain Services	Jim Riordan	www.riordangrains.com.au
			5	
	B2	Centre State Exports	Jeff Voigt	www.centrestateexports.com.au
		Inghams Enterprise Pty Ltd	Matt Clarke	www.ingham.com.au
		J K International Pty Ltd	Sandeep Mohan	www.jki.com.au
		Ridley Agriproducts	Reagan Stroud	www.agriproducts.com.au
		Riverina (Australia) Pty Ltd	Gareth Stapleton	www.riverina.com.au
		Wilmar Gavilon Pty Ltd	Matt Albion	www.wilmargavilon.com
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	B3	Allied Pinnacle	Brett Duczmal	www.alliedmills.com.au
		Boolah Farms Pty Ltd	Stuart Tighe	www.boolah.com.au
		Brahman Commodities	Michael Aikman	www.brahmancommodities.com.au
		Cofco International Australia	Sarah Pan	www.cofcointernational.com
		Demeter Grains	Barry Mansfield	www.demetergrains.com.au
		K M & W M Kelly & Sons	Matt Kelly	www.kellygrains.com.au
		Quadra Commodities Pty Ltd	Robin Cassar	www.quadra.com
	Robinson Grain Trading	Adam Robinson	www.robinsongrain.com.au	
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	C1	Adams Australia Pty Ltd	Ian Mack	www.adamsaustralia.com.au
		Agracom	Joe Hallman	www.agracom.com.au
		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
		Australian Food & Fibre Processing	Peter Webb	www.australianfoodandfibre.com.au
		Australian Fresh Milk Holdings (AFMH)	Jill Smith	www.afmh.com.au
		BFB Pty Ltd	Shane Bird	www.bfb.com.au
		Blairs Produce Company	Sean Blair	crt.com.au/store/blairs-produce-company/
		Castlegate James Australasia Pty Ltd	Ross Giovanetti	www.castlegatejames.com.au
		COPRICE	Hugo Steinfert	www.coprice.com.au
		Darwalla Milling Co Pty Ltd	Gary Heidenreich	www.darwalla.com.au
		DDT Holdings	Rajeev Saraff	www.dtdholdings.com.au
		Deckert Group Pty Ltd	Chris Deckert	www.deckerts.com.au
		Esperance Quality Grains Pty Ltd	Neil Wandel	www.esperancequalitygrains.com
		Fletcher International Exports	Joe Masters	www.fletchint.com.au
		Fodder Link Pty Ltd	Cameron Angel	www.fodderlink.com.au
		Hanlon Enterprises	Chris Coates	www.hanlonenterprises.com.au
		Hazeldenes Chicken Farm	Marcus Dingle	www.hazeldenes.com.au
		IGH Commodities	Brad Bryant	www.igh.net.au
		Inaria Australia	Karan Singh	www.inariaustralia.com.au
		Irwin Stockfeeds	Bryan Irwin	www.irwinstockfeeds.com.au
		Itochu Australia Ltd	Ayush Rajvanshi	www.itochu.com.au
	Jerilderie Grain Storage & Handling	David Barlow	www.jgsh.com.au	
	Laucke Flour Mills Pty Ltd	Roger Laubsch	www.laucke.com.au	
	Lawson Grains Pty Ltd	John Marshall	www.lawsongrains.com	
	LPC Trading Pty Ltd	Simon Langfield	www.lpctrading.com.au	
	Malteurop Australia Pty Ltd	Eric Fisher	www.malteurop.com/en/australia	
	MC Croker	Jason McPherson	www.crokergrain.com.au	
	MSM Milling Pty Ltd	Peter MacSmith	www.msmmilling.com.au	
	Namoi Cotton Ltd	Nathan Hunter	www.namoicotton.com.au	
	Pentarch Agricultural Pty Ltd	James Whiteside	www.pentarch.com.au	

	Premium Grain Handlers P/L	John Orr	www.pgh.com.au
	Queensland Cotton Corporation	Ashish Govil	www.qcotton.com.au
	Reid Stockfeeds Pty Ltd	Ian Reid	www.reidstockfeeds.com.au
	Rex James Stockfeed	Natasha Davies	www.jamesstockfeed.com.au
	Rivalea (Australia) Pty Ltd - Animal Nutrition	Andrew Philpotts	www.rivalea.com.au
	Riverina Oils & Bioenergy	Krissy Campbell	www.riverinaoils.com
	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.woodsgrain.com.au
	XLD Commodities	John Tuskin	www.xldgrain.com.au
		47	
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	Francois 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.austrianchoiceexports.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.austriallanmungbean.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
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	CL Commodities	Robert Lean	www.clcommodities.com.au
	Coorow Seeds	Brian Pover	www.coorowseeds.com.au
	Cory Johnston (Aust) Pty Ltd	Alicia Dolan	www.coryjohnston.com.au
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	Defiance Maize Products Pty Ltd	Rodney Walker	www.corson.co.nz
	Direct Commodities Pty Ltd	Hamish Robertson	www.directcommodities.com.au
	East Coast Stockfeeds	Stuart Dolden	www.ecsf.com.au
	Ellerslie Free Range Farms Pty Ltd	Maria Sue-Tin	www.dahall.com.au
	ETG Processing Pty Ltd T/A Wimpak	Brock Tait	www.wimpak.com.au
	Export Import Australia	Dhanesh Kumar	www.exportimportaustralia.com.au
	Export Trading Group Australia Pty Ltd	Shayne Clark	www.etgworld.com
	Fanmac Logistics Pty Ltd	Chris Fanning	www.fanmacag.com.au
	Feed Central Pty Ltd	Tim Ford	www.feedcentral.com.au
	Findlays Barellan	Neil Findlay	www.findlay.world/about-us
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	GO Resources Pty Ltd	Murray Gannon	www.go-resources.com.au
	Grainforce Pty Ltd	Derek Larnach	www.grainforce.com
	Grain Link WA Pty Ltd	Andrew Goyder	www.grainlink.com.au
	GrainTrend Pty Ltd	Sanjiv Dubey	www.graintrend.com
	Grenfell Commodities Pty Ltd	Glenn Beasley	www.grenfellcomm.com.au
	GV Grain & Fodder	Joanne Harry	linkedin.com/in/joanne-harry-707119116
	Hartree Partners (Australia) Pty Ltd	Daniel Miller	www.hartreepartners.com
	Harwood Grains & Stockfeeds	Paul Harwood	www.harwoodgrains.com.au
	Horizon Commodities Pty Ltd	Aaron Jones	www.horizoncommodities.com.au
	HX Food Group (Aus) Pty Ltd	Dong Zhao	www.hxfoodgroup.com.au
	Jatlee Australia	Sunil Kumar	www.jatleecorp.com
	J W Koek & Company	Brian Algate	07 3341 4548
	Kangaroo Island Pure Grain	Emma Tonkin	www.kipuregrain.com
	KB Agri Services Pty Ltd	Karl Bliss	linkedin.com/in/karl-bliss-916bb679
	Kennett Rural Services Pty Ltd	Andrew Kennett	www.kennetrural.com.au
	Lachlan Commodities Pty Ltd	Tony Cogswell	www.lachlancommodities.com

		Lane Grain Pty Ltd	Garry Lane	linkedin.com/in/gary-lane-82635b88
		Laragon Almond Processors Pty Ltd	Mark Webber	www.laragon.com.au
		Mallon AgCommodities	Blake Mallon	mallonag.com.au
		Mandala Trading	Jay Saraff	www.mandalatrading.com.au
		Marina Commodities (Australia)	Palwinder Singh	www.marinacommodities.com
		Matthews Transport and Grain Traders	Neville Matthews	linkedin.com/in/neville-matthews-aa592191
		Max Grains Pty Ltd	Jack Fahy	www.maxgrains.com.au
		Mckenzie Ag Services	Lachlan Mckenzie	www.mckenzieag.com.au
		McNaughts Grain & Fertilizer Pty Ltd	Daniel Mcnaught	www.mcnaughts.com
		Melaluka Trading Pty Ltd	Simon Pritchard	www.melalukatrading.com.au
		Melco Pty Ltd	Steve Mellington	www.melco.com.au
		Nandaly Grain Co-Operative	Jon Bucknall	www.nandalyco-op.com.au
		Network Grains Pty Ltd	Craig Dennis	www.networkgrains.com.au
		Northbound Trading Pty Ltd t/a WA Lupins	Daniel Marshall	www.walupins.com.au
		Origin Grain Pty Ltd	Marcus Currie	www.origingrain.com
		Outlook Commodities	Dominic Hogan	https://facebook.com/Outlookcommodities
		Pacific Global Sprouts Pty Ltd	Prashant Kewlani	www.pacificglobalsprouts.com
		Parkinson Bros	Rohan Parkinson	linkedin.com/in/rohan-parkinson-a76a761b4
		PB Seeds	Peter Blair	www.pbseeds.com.au
		Pearson's Grain	Darren Pearson	www.pearsonsgroup.com.au
		Peters Commodities	Michael Oxley	www.petcom.com.au
		Pinnacle Grains Pty Ltd	Sonal Vij	www.pinnaclegrains.com.au
		Plum Grove	Rikki Foss	www.plumgrove.com.au
		Pure Foods Eggs Pty Ltd	Tim Castle	www.purefoods.com.au
		QS Commodities Pty Ltd	Nick Slipper	www.qscommodities.com
		Quirindi Grain & Produce	John Webster	john.webster@quirindigrain.com.au
		RP Grain Pty Ltd	Gordon Pulham	randpcarriers.com.au/r-p-grains
		Rural Logic (Aust) Pty Ltd	Michael Wood	www.rurallogic.com.au
		Shannon Bros Bulk Storage Pty Ltd	Clayton Shannon	www.shannonbros.com.au
		Silo Bag Grain (NSW QLD) Pty Ltd	Lesley Kilby	www.silobaggrain.com.au
		Societa Cofica Pty Ltd	Dia Ram Sharma	www.societacofica.com.au
		Southern Grain Pty Ltd	Tim Gross	www.southernstockfeeds.com.au
		Southern Grain Storage Pty Ltd	Campbell Brumby	www.southerngrains.com.au
		Spagrico Australia	Jiger Kotecha	www.spagrico.com.au
		Standard Commodities Australia Pty Ltd	Elizabeth Bozinoska	www.stancom.com.au
		Sudima Australia	James Garvey	www.sudima.com
		Sun Euro Australia	Tarun Saxena	www.suneuro.com.au
		Tamma Grains Australia Pty Ltd	Kim Packer	www.tammagrains.com.au
		Tiller Commodities Pty Ltd	Brett Cooper	www.tillercommodities.com
		TRC International	Yohan Goonetilleke	www.trcglobal.com.my
		Trentham Grazing Pty Ltd (t/a Godde's Grain & Fertiliser Pty Ltd)	Barry Fisher	www.goddesgrainandfertiliser.com.au
		Ulusoy Asia Pacific Pty Ltd	Muhammet Genc	www.ulusoyflour.com
		Universal Commodity Management	Tim Dean	www.commoditymanagement.com.au
		Ward McKenzie Pty Ltd	Greg Howe	www.mckenziefoods.com.au
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		Watsons Bulk	Joel Watson	www.wbl.net.au
		WHG Oceania Pty Ltd	Gesheng Shen	shen@tgaj.cn
		Wirrinour Transport & Trading	Karl Hendy	www.wirrinourtransport.com.au
		WW Agri Pty Ltd	Steve Sloss	www.wagri.com.au
		ZTC Australia	Timothy Byass	www.ztcaus.com
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Transport Operator		Crawfords Freightlines Pty Ltd	Phillip Davis	www.crawfordsfreightlines.com.au
		Gehrke Grains & Transport Pty Ltd	Julian Gehrke	www.gehrke.com.au
		Hamilton Contracting (NSW) Pty Ltd	Jodie Hamilton	www.hamiltoncontracting.com.au
		Horne Ag Logisitics Pty Ltd	Jeremy Horne	www.horneaglogistics.com.au
		Pacific National (NSW) Pty Ltd	Nick Ryder	www.pacificnational.com.au
		SEAWAY Intermodal Pty Ltd	Bikash Ram	www.seawayintermodal.com.au
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Broker	Medium	Fox Commodities Pty Ltd	Paul Cochrane	www.foxcommodities.com.au
		Grain Brokers Australia	Jeff Winspear	www.grainbrokers.com.au
		Horizon Grain Brokers Pty Ltd	Ash Munro	www.horizongb.com.au
		Pure Grain Network Pty Ltd	Stuart Tighe	www.puregrain.com.au
		Quest Commodities Pty Ltd	Jayne Barker	www.questcommodities.com.au
		Rain Agribusiness	Ian Grellman	www.rainag.com.au
		StoneX Financial Pty Ltd	Stefan Meyer	www.intlfcstone.com
		Teague Australia Pty Ltd	Tim Teague	www.teague.com.au
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	Sole Operator	A C Grain	Adam Clarke	www.acgrain.com
		Allied Grain Pty Ltd	Angus Wettenhall	www.alliedgrain.com.au
		Cogeser (Australia) Pty Ltd	Robert Luetolf	www.cogeser.com.au
		Farm Tender	Matt Henke	www.farmtender.com.au
		Lotema Pty Ltd	Todd Lees	www.lotema.com.au
		Mallon Commodity Brokering	Ian Mallon	www.mcbrokering.com

		McDonald Pelz Australia	Stuart Richardson	www.mcdonaldpelz.com	
		Perkins Commodity Brokers	Craig Perkins	linkedin.com/in/craig-perkins-9a27211a	
		Woodside Commodities Pty Ltd	Hamish Steele-Park	www.woodcomm.com.au	
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Corporate	Large	ASX	Ian Waddell	www.asx.com.au/grainfutures	
		Australian Grain Technologies	Tristan Coram	www.agtbreeding.com.au	
		Barrett Burston Malting Co.	Dean Ganino	www.bbmalt.com.au	
		BoortMalt Asia Pacific Pty Ltd	Simon Robertson	www.boortmalt.com	
		CIS Control Union Australia	Mathew Conoulty	cis-controlunion.com	
		Commonwealth Bank of Australia	Tom Morgan	www.commbank.com.au	
		NSW Ports	Campbell Mason	www.nswports.com.au	
		Sanitarium Health Food Company	Nathan Bullock	www.sanitarium.com.au	
		Symbio Laboratories	Kristian Just	www.symbiolabs.com.au	
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	Medium	AgriDigital	Emma Weston	www.agridigital.io	
		AgriFood Technology	Doreen Fernandez	www.agrifood.com.au	
		Amspec Australia	Lee Shilvock	www.amspecgroup.com.au	
		Australian Superintendence Company (ASC)	Andrew Parry	www.austsupco.com.au	
		Clear Grain Exchange	Nathan Cattle	www.cleargrain.com.au	
		Foss Pacific	Rod Gleeson	www.foss.com.au	
		HFW Australia	Stephen Thompson	www.hfw.com	
		Holding Redlich	Geoff Farnsworth	www.holdingredlich.com	
		Intertek	Debrah Millard	www.intertek.com	
		Mars Petcare Australia (t/a Mars Birdcare)	Kurt Sosinski	www.mars.com.au	
		Oldendorff Carriers Melbourne	Allen Dewhirst	www.oldendorff.com	
PSC Griffith Goodall Insurance Brokers		Mandy Gladman	www.pscgib.com.au		
Qube Logistics (SB) Pty Ltd (T/A Qube Agri)		Jeremy Brown	www.qube.com.au		
SBA Law		Jeremy Rosenthal	www.sbalaw.com		
SGS Australia	Trent Charlton-Maughan	www.au.sgs.com			
T-Ports	Nathan Kent	www.tports.com			
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Small	Advance Trading Australasia	Andrew Woodhouse	www.advance-trading.com.au		
	Ag Scientia	Lloyd George	www.agscientia.com.au		
	AgVise (WA) Pty Ltd	Shane Sander	www.agvise.com.au		
	Aperture Ag Pty Ltd	Alex Campbell	www.apertureag.com.au		
	Basis Commodities	Chris Whitwell	www.basiscommodities.com		
	BSM Global	Jason Flemming	www.buysellmove.com		
	Cloudbreak Grain Marketing	Ed Scamps	www.cloudbreak.com.au		
	Delta Agribusiness	Michael Parry	www.deltaag.com.au		
	E P Integrated Commodities Pty Ltd	Tracey Lehmann	epicbrokers.biz		
	Farmanco Marketing Pty Ltd	Donald McTaggart	www.farmanco.com.au		
	FARMARCO Australia Pty Ltd	Rob Imray	www.farmarco.com.au		
	Finesse Solutions	Malcolm Finlayson	malcolm@finessesolutions.com.au		
	Flexi Grain Pty Ltd	Jarrold Tonkin	www.flexigrain.com.au		
	Futari Grain Technology Services	Leah Petrie	www.futari.com.au		
	Goldstar Commodities	Geoff Webb	www.goldstarcommodities.com.au		
	Graintec Scientific	Lucas Anstiss	www.graintec.com.au		
	Grainx	Judi Morgan	www.grainx.com.au		
	Greenoaks Agriculture Pty Ltd	Richard Perkins	https://linkedin.com/in/richard-perkins-39090a3b/		
	Harvestcheck Pty Ltd	Stephen Schumacher	www.harvestcheck.com.au		
	Hay Plains Grain Storage Pty Ltd	Ron Harris	www.fellowsbulk.com.au/grainstorage		
	IKON Commodities	Ole Houe	www.ikoncommodities.com.au		
	Indyn	Rob Martin	www.indyn.net		
	Lachstock Consulting	Nick Carracher	www.lachstockconsulting.com.au		
	Longbridge Commodities	Ben Langford	www.longbridge.com		
	MarketAg Pty Ltd	Mark Martin	www.marketag.com.au		
	McMullen Consulting	Gerard McMullen	www.mcmullengrainagricultural.com		
	Mercari Pty Ltd	Daniel Marsh	www.mercari.com.au		
	Mirfak P/L	Josh Whelan	www.mirfak.com.au		
	National Grower Register	Debbie Newmarch	www.ngr.com.au		
	OMIC Australia Pty Ltd	Koji Nakashima	www.omicaustralia.com.au		
	Perten Instruments	Raul Ovelar	www.perten.com		
	Pinion Advisory	Chris Heijus	www.pinionadvisory.com		
	Planfarm Marketing Pty Ltd	Jerome Critch	www.planfarm.com.au		
	Priag Marketing Pty Limited	Kevin Schwager	www.priag.com.au		
	Primal Foods Group	Peter Longhurst	www.primalfoodsgroup.com		
	Profarmer and Australian Crop Forecasters	James Maxwell	www.nzx.com		
	Rise Agribusiness	Ian Dalgliesh	www.riseagri.com.au		
	Saputo Dairy Australia	Ashley Denishensky	www.saputo.com		
	SGA Solutions Pty Ltd	David Hudson	linkedin.com/in/david-hudson-8240b913		
	Sizer & Cogill (t/a NQ Bulk)	Chris Sizer	www.sizercogill.com.au		
	Ten Tigers	Chris Tonkin	www.tentigers.com.au		
TE Storage & Logistics Pty Ltd	Tom Hage	www.testorage.com.au			

		TT Club Mutual Insurance	Rhys Richards	www.ttclub.com
		Ultimate Global Trading Pty Ltd	Andrew Alexopoulos	www.ultimategt.com.au
		Wattletree Consulting	Joe Righetti	www.wattletree.net.au
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International Affiliate		CIS Commodity Inspection Services	Paul Schweitzer	www.cis-inspections.com
		Grains Middle East Trading DWC-LLC	Mark Stapleton	www.grains-middleeast.com
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Industry Association		AEGIC	Courtney Draper	www.aegic.org.au
		Grain Growers Limited (GGL)	Shona Gawel	www.graingrowers.com.au
		Grain Industry Association of WA (GIWA)	Peter Nash	www.giwa.org.au
		Grain Producers Australia Ltd (GPA)	Colin Bettles	www.grainproducers.com.au
		NSW Farmers Association	Elen Welch	www.nswfarmers.org.au
		Stock Feed Manufacturers' Council of Australia (SFMCA)	Duncan Rowland	www.sfmca.com.au
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Merchant Association		Grain Industry Association of SA	Marie Cunningham	www.giasa.org.au
		Grain Industry Association of VIC (GIIV)	Colin Peace	www.giiv.com.au
		Grain NSW	Joanne Ware	www.grainnsw.com.au
		Queensland Agricultural Merchants (QAM)	Rob Imray	www.qam.org.au
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