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30th September 2024

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

Email: Via Web

Re: Submission: Capability Review: Department of Agriculture, Fisheries and Forestry

Dear Sir/Madam,

Thank you for the opportunity to reply to the call for submissions on the Department of Agriculture. Fisheries and Forestry (DAFF) Capability Review, In Grain Trade Australia's (GTA) view DAFF's current and future level of capability is important for the grain industry's efficiency and growth.

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 grain 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 300 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, importation of plant protein meal, 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 pay for the DAFF grain export cost recovery (ECR) program.

1. Value of Australian Export Regulations

The Australian grain industry has a reputation as a reliable supplier of quality grain on the international market. This reputation is supported and enhanced by the export regulations managed by DAFF to ensure grain meets importing country quarantine requirements. GTA and its members fully support those regulations and work collegiately with DAFF to achieve our joint objectives.

2. DAFF Performance against its Strategy

2.1 Financial Performance / Service

GTA understands the focus on DAFF's capability as the department's financial difficulties during 2023 were well publicised leading to reported:

- restrictions on non-essential travel and training;
- re-prioritising non-critical projects; and
- a reduction in contracted workforce numbers.

It is noted from a study of the Capability Review whilst heavily focussed on the positives of DAFF performance, it re-confirms and captures multiple issues that GTA and its members were aware of during this past period and up to the current period. A number of these were detailed in prior GTA Submissions provided to DAFF

- DAFF Funding Review July 2024
- DAFF CRIS Feedback May 2024

2.2 Performance against Budgets

The Grain and Plant Products Export Industry Consultative Committee (GPPEICC) is the principal forum for DAFF to consult with the grain, fodder, nuts, seed and timber industries on export inspection and certification, export market access and other relevant issues.

As noted in prior submissions a focus for the GPPEICC is to review **DAFF performance against budget**. The Capability Review highlighted the issues DAFF has with management reporting relating to its accounting and reporting performance. GTA and its members are well aware of these issues having experienced DAFF's inability to provide adequate financial reports and data as a result of numerous issues including complexity due to the 'machinations of Government'.

GTA questioned DAFF when basic financial data was not able to be reported to GPPEICC, including how could DAFF managers effectively manage their own resources and budgets without visibility of financial data? It appears from the Capability Review they were experiencing the same or similar frustration with a lack of financial data.

2.3 Digital Reforms and Transformative Projects/Asset Management ICT

Government through its recent *Congestion Busting* investment dedicated \$222.2m to upgrade the Information Technology that underpins the government export system. This was seen as a much-needed investment to streamline and simplify DAFF processes and export services and to transform it into a modern and efficient partner for industry.

However, as experienced by the grain industry through the lack of delivery of projects and system upgrades such as *nexdoc* these planned transformative projects do not appear to have delivered against their initial objectives.

As reported in the Capability Review DAFF now has a limited IT annual capital budget of \$10.1m that may not support the department's ability to make progress towards modernisation. This is of concern and a risk for the grain industry moving forward.

As noted previously, GTA welcomes and supports transformative projects that align industry and Government strategy including joint DAFF & GTA projects that are underway. The joint approach to these and other projects will release value and assist in the longer term towards the goal of DAFF being the modern and efficient partner for industry that we all desire.

3. Unfunded Activities

Government has allocated \$3.7m over three years to enable the development of an ongoing sustainable export funding model to ensure DAFF remains appropriately resourced to carry out its agricultural trade and export functions into the future.

GTA has commented this 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.

It is also important that all industry sectors are charged their appropriate cost. It is noted the Capability Review raised several concerns regarding **unfunded activities** including they pose a risk to DAFF's financial sustainability.

Whilst GTA supports cost recovery as a mechanism to provide key services not covered through Government consolidated revenue, this is based on the **cost being apportioned across all sectors based on their activities** and balanced by the provision of an effective and efficient service.

4. DAFF Transformation Action Plan

From its review of the DAFF Transformation Action Plan (the Plan) GTA's concerns and issues with the current DAFF performance and its capability do not lessen.

The Plan appears to be more a statement of wishful intent rather than a concrete Transformation Action Plan. There appears to be no focus on milestones or major steps/actions to effect transformative change. This is especially of concern in the critical areas of financial management and information technology where the Plan's priority actions appear to be aspirational motherhood statements.

Priority actions

5.1 Financial management

Redesign our finance operating model to uplift financial literacy and accountability, review our operating model and deliver an enterprise-wide approach that lifts financial maturity and performance across the organisation.

5.2 10-year digital sustainment investment roadmap

Deliver a roadmap that will address key risks (including the ICT technical debt), modernise systems and establish an ongoing sustainment, robust and secure digital landscape.

5.3 Information and data maturity roadmap

Strengthen our data analytics capability to underpin effective performance monitoring, risk management, operational and strategic policy settings, regulation, and service delivery operations.

The industry requires transparency and access to what is actually being attempted to improve the capability of DAFF. This Plan does not appear adequate in several areas. It does not seek to engage with DAFF clients or to promote visibility of what is being done or attempted and has little focus on understanding industry requirements and service levels.

5. GTA Feedback/Position

GTA and its members as clients of DAFF wish to be involved in the transformative change of DAFF and ask DAFF management to provide the necessary visibility and mechanism to assist in the transformative process.

GTA promote and recommend greater DAFF senior management engagement with key exporter associations such as GTA to work collegiately on this reform process. This may be achieved through a forum of larger client association that can assist and be part of the transformative journey.

GTA support DAFF completing and implementing the work underway in the DAFF cost recovery model as the department cannot operate unless it is properly funded. The past few years have demonstrated the impact a lack of funding and poor financial and IT project governance can have on DAFF's capability and the agricultural industry's efficiency.

DAFF management must also focus on getting the department to a suitable level of efficiency to ensure a stable platform to then focus on the improvements that are necessary.

6. In Summery

An efficient and effective DAFF is critical to the grain industry. DAFF management must lead the department on its journey to real transformative change to support grain and other agricultural sectors.

GTA consider DAFF capability a risk for grain industry growth and request greater transparency and a higher level of access to DAFF management through a suitable forum to be able to engage and assist DAFF in is transformative journey.

Thank you for this opportunity to comment.

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

Yours faithfully,

Pat O'Shannassy

CEO, Grain Trade Australia



Membership List as of 25 September 2024

ember Type	Member Level		Account Name Primary Contact Website			
dinary Member	A1	CBH Group	Ben Macnamara	www.cbh.com.au		
		GrainCorp Australia Viterra Australia	Robert Spurway Philip Hughes	www.graincorp.com.au www.viterra.com.au		
		Viterra Australia	3	www.viterra.com.au		
	A3	Cargill Australia	Zsolt Kocza	www.cargill.com.au		
	A4	ADM Trading Australia	1 Darryl Borlase	www.adm.com		
		Arrow Commodities	Dominic Vanzella	www.arrowcom.com.au		
		Australian Grain Export Pty Ltd	Tim Martin	www.australiangrainexport.com.au		
		Bunge Agribusiness Australia	Stephen Bennett	www.bunge.com		
		Louis Dreyfus Company Emerald Australia	David Johnson	www.ldc.com		
	B1	CHS Broadbent	Steve Broadbent	www.broadbentgrain.com.au		
		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		
	B2	Centre State Exports	Jeff Voigt	www.centrestateexports.com.au		
		ETG Commodities	Peter McMeekin	www.etgworld.com		
		Inghams Enterprise Pty Ltd	Matt Clarke	www.inghams.com.au		
		J K International Pty Ltd	Sandeep Mohan	www.jki.com.au		
		Ridley Agriproducts Riverina (Australia)	Reagan Stroud Jon Mulally	www.agriproducts.com.au www.riverina.com.au		
		Wilmar Trading (Australia) Pty Ltd	Matt Albion	www.wilmargavilon.com		
		William Francisco (Francisco) Francisco (Francisco)	7	WWW.WilliagsWorkerin		
	B3	Allied Pinnacle	Brett Duczmal	www.alliedmills.com.au		
		Brahman Commodities	Michael Aikman	www.brahmancommodities.com.au		
		Cofco International Australia Demeter Grains	Sarah Pan Barry Mansfield	www.cofcointernational.com www.demetergrains.com.au		
		K M & W M Kelly & Sons	Matt Kelly	www.kellygrains.com.au		
		Quadra Commodities	Robin Cassar	www.quadra.com		
		Qube Logistics (SB) Pty Ltd (T/A Qube Agri)	Jeremy Brown	www.qube.com.au		
		Robinson Grain Trading	Adam Robinson	www.robinsongrain.com.au		
	C1	Agracom	8 Inc Hollman			
	CI	Agracom Agrisk (Market Check)	Joe Hallman Brett Stevenson	www.agracom.com.au 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 Blairs Produce Company	Shane Bird Sean Blair	www.bfb.com.au crt.com.au/store/blairs-produce-company/		
		Boolah Farms Pty Ltd	Stuart Tighe	www.boolah.com.au		
		Castlegate James Australasia Pty Ltd	Kevin O'Brien	www.castlegatejames.com.au		
		COPRICE	Hugo Steinfort	www.coprice.com.au		
		Darwalla Milling Co Pty Ltd	Gary Heidenreich	www.darwalla.com.au		
		DDT Holdings	Rajeev Saraff	www.ddtholdings.com.au		
		Deckert Group Pty Ltd Esperance Quality Grains Pty Ltd	Chris Deckert Neil Wandel	www.deckerts.com.au www.esperencequalitygrains.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 IGH Commodities	Marcus Dingle	www.hazeldenes.com.au		
		Inari Australia	Brad Bryant Karan Singh	www.igh.net.au 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 LPC Trading Pty Ltd	John Marshall Simon Langfield	www.lawsongrains.com 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 Premium Grain Handlers P/L	James Whiteside	www.pentarch.com.au		
		Queensland Cotton Corporation	John Orr Ashish Govil	www.gcotton.com.au		
		Reid Stockfeeds Pty Ltd	lan 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 SunPork Farms Feed Mills	Krissy Campbell	www.riverinaoils.com		
		ThriveAgri Pty Ltd	Mark Young Charlie Brown	www.sunporkgroup.com.au 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 Woods Grain Pty Ltd	Richard Wilken	www.wilkens.com.au		
		Woods Grain Pty Ltd XLD Commodities	John Tuskin	www.woodsgroup.com.au www.xldgrain.com.au		
		ALD COMMODICES	47			
	C2	Access Grain Pty Ltd	Wade Humphries	www.accessgrain.com.au		
		Adams Australia Pty Ltd	Ian Mack	www.adamsaustralia.com.au		
		Aditi UVG	Harshad Kale	www.aditiuvg.com		
		Aditya Birla Global Trading (Australia) Advantage Grain Pty Ltd	Surya Jain Chris Nikolaou	www.abgtrading.com www.advantagegrain.com.au		

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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
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Baker Grain	Richard Baker	www.bakergrain.com.au
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CL Commodities	Robert Lean	www.clcommodities.com.au
Coorow Seeds	Brian Pover	www.coorowseeds.com.au
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Direct Commodities	Hamish Robertson	www.directcommodities.com.au
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East Coast Stockfeeds		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
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Export Import Australia	Dhanesh Kumar	www.exportimportaustralia.com.au
Export Trading Group Australia Pty Ltd	Shayne Clark	www.etgworld.com
Fanmac Logisitics 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
Gold Star International Pty Ltd	Abhishek Kotkar	www.goldstarinternational.com.au
GO Resources Pty Ltd	Murray Gannon	www.go-resources.com.au
Grainforce Pty Ltd	Stella Larnach	www.grainforce.com
Grain Link WA Pty Ltd	Andrew Goyder	www.grainlink.com.au
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	Medium	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	Andrew Parry Nathan Cattle	www.cleargrain.com.au
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