



# GPA

Grain Producers Australia

## **SUBMISSION**

Grain Trade Australia Standards Review – Potential Changes for the 2024/25 season.

\* submissions due by COB Friday 17th May 2024

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Thank you for providing Grain Producers Australia (GPA) with the opportunity to submit our members' views to Grain Trade Australia's Standards Review for the 2024/25 season.

## **Introduction to GPA**

GPA represents the interests of direct grower members, state farming members and an estimated 22,500 levy-paying grain producers who grow broadacre, grain, pulse and oilseed crops throughout Australia. GPA develops national policy for Australian grain producers, advocating outcomes to help deliver a more profitable, sustainable and globally competitive grains industry. Our growers also contribute to the economic strength of their communities and the national economy with an industry valued at more than \$31 billion in 2022-23.

GPA's roles are legitimised under federal legislation, providing responsibilities to represent all levy-paying growers on vital industry matters, with shared economic and community benefits. Grain growers contribute 1.02 per cent of their net crop sales toward levies, comprising the Grains Research and Development Corporation (GRDC) for RD&E, Plant Health Australia (PHA) membership and biosecurity prevention and eradication management responsibilities, and the National Residue Survey (NRS) testing, for grain quality and market access. Of that 1.02pc, the vast majority (0.99pc) goes to the GRDC, with PHA receiving 0.01pc, the NRS 0.015pc and the emergency plant protection response the remaining 0.005pc.

GPA Sub-committees play a vital role to support these responsibilities and duties, providing expert advice and information to inform national policy development, through to the GPA Policy Council. The GPA Biosecurity Committee for examples promotes communication, engagement and advocacy to enable outcomes that help strengthen biosecurity protections and management for grain producers and industry – including GTA's members. Tougher preventative measures help protect growers, rural communities and the national economy against the social and economic impacts of devastating pests such as Khapra beetle, which could cause an estimated \$15.5 billion damage over 20 years and loss of access to important grain export markets.

*\* Further details on GPA available at the foot of this submission.*

## **Executive Summary**

GPA is an Industry Association Member of Grain Trade Australia representing the policy views of Australian grain producers on the following GTA technical Committees:

- Transport, Storage & Ports
- Commerce Committee
- Trading Standards
- Plant Breeding Innovation

This submission provides insights and recommendations regarding the current sorghum receival standards used by GTA, particularly focusing on the areas of; classification; objectivity in grading; alignment with international standards and; utilisation of technology for more accurate assessment.

### **Sorghum Feed Grade Recognition:**

It's imperative to recognise the value of sprouted sorghum in livestock feed. The conversion of complex starches to digestible sugars enhances its nutritional profile, thus increasing its value for the feed industry. We advocate for the establishment of a sorghum feed grade to reflect this nutritional enhancement accurately. We note that slightly sprouted grain still holds the same feed value, however, current grades seem to assume inferior quality with resultant pricing discounts.

### **Objective Grading and Consistency:**

Despite improvements in training subjectivity in grading remains a concern, leading to discrepancies between receival sites. To address this, we recommend further enhancement of objective test

methods, uniform training for classifiers, and the integration of AI and machine learning technologies for more consistent and accurate grading outcomes.

#### Alignment with International Standards:

Harmonising GTA standards with international counterparts is essential to ensure competitiveness in the global market. Currently, disparities between Australian and international standards may disadvantage traders financially. We propose closer alignment with international standards to mitigate these discrepancies. In line with international standards we are concerned with the proposed changes that may recognise split germ as sprouted grain (if sampler determines sprout has been displaced as opposed to scalloped grain).

#### Emphasizing Test Weight:

Test weight stands out as a reliable indicator of grain quality and should hold significant weight in classification criteria. Its inclusion as a primary parameter would enhance the overall quality assessment process.

#### Utilizing Value Parameters:

Algorithms can effectively determine various value attributes of grain, such as protein and starch content. Incorporating these parameters into testing procedures enhances objectivity and provides more comprehensive insights into grain quality.

Transparent Appeal Process: In cases of clear inconsistencies in classification, a robust and transparent appeal process is necessary to address grievances effectively. This ensures fairness and integrity within the grading system.

#### Clarity in Definitions:

Clear and well-written definitions are indispensable for accurate classification. Visual recognition guides, while useful, should not compromise objectivity. Therefore, we advocate for guidelines that enhance clarity without sacrificing accuracy.

#### Balancing Efficiency and Accuracy in Testing:

While mould presence indicates a potential for mycotoxins, it doesn't necessarily render the grain unfit for consumption. There should be a balanced approach to testing that considers both efficiency and fairness to growers, avoiding unnecessary penalties.

### **Recommendation**

In conclusion, we urge the Grain Trade Australia Standards Committee to consider these points for the ongoing refinement of standards and practices within the grain trade industry. By addressing these areas, we can foster greater consistency, objectivity, and competitiveness in the market.

Thank you for your attention to these important matters.

#### **GPA Contact**

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## **GPA's Representative Roles and Responsibilities**

Grain Producers Australia represents the interests of an estimated 22,500 grain producers who grow broadacre, grain, pulse and oilseed crops throughout Australia, contributing to the economic strength of their communities. GPA advocates national policy outcomes with benefits for grain producers and to deliver a more profitable, sustainable and globally competitive Australian grains industry.

As a not-for-profit company limited by guarantee, GPA is governed by a board that's elected by producer members, representing the major grain producing regions. GPA's membership comprises direct producer members and producer members of the Grains Councils of State Farming Organisations. The elected leaders of these groups – backed by professional staff – also represent their members' interests, via the GPA Policy Council.

GPA's State Members include:

- AgForce Grains
- Grain Producers SA
- NSW Farmers Association
- Victorian Farmers' Federation Grains Group
- Tasmanian Farmers and Graziers Association
- WAFarmers Grains Council
- WA Grains Group

This robust representative process also engages and enables producers to advocate their views and deliver policy outcomes via various GPA Sub-Committees and Taskforces, such as the GPA Biosecurity Committee and GPA Pesticides and Technology Sub-Committee.

GPA's objectives are to:

- Provide a strong, independent, national advocate for grain producers based on a rigorous and transparent policy development process.
- Engage all sectors of the Australian grains industry to ensure operation of the most efficient and profitable grain supply chain.
- Facilitate a strategic approach to research, development and extension intended to deliver sound commercial outcomes from industry research.

GPA's responsibilities representing the interests of Australia's 22,500 levy-paying grain producers are legitimised under federal legislation.

This includes; managing biosecurity for the Australian grains industry through Plant Health Australia as a signatory to the Emergency Pest Plant Response Deed (EPPRD); as a joint Representative Organisation responsible for overseeing the Grains Research and Development Corporation's performance and strategic investment, with matching Federal Government funding, in RD&E activities, under the PIRD Act; and managing the risk of chemical residues and environmental contaminants in grain products, to help facilitate access to domestic and export markets and protect product integrity and export reputation, via the National Residue Survey.

Further information: <https://www.grainproducers.com.au/>