

Grain Trade Australia Limited  
PO Box R1829  
Royal Exchange  
NSW 1225

Dear Grain Trade Australia,

RE: Calling for Industry Submission: GTA TGD No.4 Operating Standards for Pool Providers

Agfarm wish to make a submission regarding GTA's complaint handling process. Agfarm firmly agree it is vital for the grain industry to have rigorous complaint handling guidelines. Furthermore, Grain Trade Australia and the Pool Providers Sub-Committee could further develop the complaints handling procedures for Pool Providers. Currently, complaints can be marked as confidential giving rise to:

- Difficulties responding to complaints as respondents do not know the audience or the precise nature of the complaint
- It does not place ownership on the source of the complaint
- Concern over the complaints process being mis-directed as a tool of commercial competition

First, Agfarm believes that any complaint made should be marked by the complainant. If this is not feasible, Grain Trade Australia should identify the segment of the industry the complaint has originated from. This can be grower, pool provider or trade. Knowing the correct source of the complaint would facilitate the complaints process with transparency and efficiency.

Second, Agfarm believe there should be guidelines developed to ensure complaints are specific and factual in relation to the issue raised. Greater detail and increased fact surrounding a complaint will improve the ability to respond in a timely and accurate manner.

Stricter guidelines around the complaints process will help protect all stakeholders as we seek to improve the GTA TGD No. 4 as an industry.

One potential solution is to have the complainant, GTA and the respondent be bound by confidentiality. This would allow parties the ability to ask questions and gather greater fact before responding. GTA will act as the intermediary facilitating questions and responses to help achieve a resolution.

Regards,

Chris Nikolaou



General Manager – Operations