

4 September 2015

Cost Recovery Task Force
Department of Agriculture
GPO Box 858
Canberra ACT 2601

Dear Sir/Madam,

Re: Alternative plant exports cost recovery model released 28 August 2015

Grain Trade Australia (GTA) provides the following submission in response to the alternative plant exports cost recovery model released on 28 August 2015.

This is a supplementary submission to the following previously lodged submissions (attached).

- GTA submission - DA Biosecurity - IN CONFIDENCE 8 August 2015
- GTA submission - DA Biosecurity CRIS Consultation draft 5 August 2015

The GTA positions as detailed in both the above submissions have not changed as a result of the Grain & Plant Products Export Industry Consultative Committee (GPPEICC) meeting held in Canberra on Thursday 27 August and the alternative plant exports cost recovery model released on 28 August 2015.

GTA would also submit that due to a total lack of agreement between the grain industry and the DA Cost Recovery Task Force on the major issues and the lack of industry confidence in the process, that:

1. the current fees and charges schedule is maintained;
2. an independent review of the Grain Export Program is conducted to align revenue categories to identified cost centres associated with the conduct of the **Grain** Export Program; and
3. the financial reporting of the Grain Export Program is not aggregated with the Horticultural Export Program;

Further, GTA would propose that the draft Cost Recovery Impact Statement, noting the multiple amendments, is in breach of the Australian Government Cost Recovery Guidelines, July 2014, published by the Department of Finance.

GTA members look forward to continuing the dialogue with the Department to develop a transparent and equitable fees and charges model for the inspection and certification services conducted by the Department for the export grain sector.

Please contact the writer to obtain a copy of any or all of the cited public references noted in the footnotes.

Yours sincerely



Geoff Honey
Chief Executive Officer

cc: The Hon. Barnaby Joyce, MP, Minister for Agriculture
Senator the Hon Mathias Cormann, Minister for Finance

1 Review of Cost Recovery arrangements – opening comments

GTA fully supports the:

- policy of full cost recovery of expenses from organisations or sectors that receive goods and or services resulting from the inspection and certification of export grain related activities.
- Australian Government Cost Recovery Guidelines - Resource Management Guide No. 304, July 2014 – Third edition, which clearly details that fees and charges, must be charged to a specific individual, organisation or industry sector.

GTA notes that the review¹ must be:

1. approved by the Minister for Agriculture; and
2. a copy must be provided to the Minister for Finance.

GTA submits that:

- The Cost Recovery Task Force is **in breach of the Australian Government Cost Recovery Guidelines - Resource Management Guide No. 304, July 2014 – Third edition** by:
 - aggregating the financial reporting of the grain and horticulture export programs leading to the cross subsidisation between the grain and horticulture sectors;
 - allocating fees and charges to fit a combined horticulture/grain CRIS model rather than aligned to the actual costs that should be allocated to the grains sector.
- The GTA positions as detailed in previous submissions (attached):
 - **have not changed** as a result of the Grain & Plant Products Export Industry Consultative Committee (GPPEICC) meeting held in Canberra on Thursday 27 August and the alternative plant exports cost recovery model released on 28 August 2015; and
 - are expressly incorporated into this submission.

2 Department of Agriculture Cost Recovery Principles – Position paper, September 2014

GTA fully supports the following extract from the above document:

4. Cost recovery arrangements must ensure all recipients contribute reasonably to the costs of the activities and services they receive.

- *There must be alignment between the expenses of the activity (the costs involved in providing it) and the revenue (the income generated through charges for it).*
- *Cost recovery fees must link an activity and its cost to a specific individual or organisation.*
- *Where the link between an activity or service and recipient is less clear, cost recovery charges (levies) can be used to recover the costs of those activities and services provided to that group.*
- *However, it is particularly important when designing cost recovery charges that all recipients within the group pay a reasonable portion of the costs. That is, there should be no free-riders and cross-subsidisation by one sub-group of another should be minimised. This can be achieved by selecting an appropriate cost driver that approximates the level of resources used to provide the activities or services to each sub-group.*

¹ Australian Government Cost Recovery Guidelines - Resource Management Guide No. 304, July 2014 – Third edition, para 17

3 Aggregating the financial reporting of the Grain & Horticulture Export Programs

- The Grain Export Program and the Horticulture Export Program are currently conducted as separate activities for the purposes of financial reporting within the Department.
- The Cost Recovery Implementation Statement – Consultation Draft – Plant Export Certification, 2015/16. Attachment B details that²

The department is consolidating its cost recovery arrangements for grain and seed exports and the horticulture exports into a single cost recovery arrangement—plant export. Cost recovery of organic certification will also be incorporated in the new plant export arrangement.

GTA submits that:

- Grain, horticulture and organics are not a “logical aggregation of agency items”³.
- Aggregating the financial reporting of grain, horticulture and organics is in breach of the Australian Government Cost Recovery Guidelines – refer Section 6 of this submission.
- GTA repeats that the financial arrangements for the grain export program must continue to be reported separately from the horticulture and organic industries and not reported on an aggregated basis.

4 Aligning expenses to revenue between the horticulture and grain programs

- The Horticulture Export Program, Cost Recovery Impact Statement 1 July 2012 to 30 June 2013, on page 24 notes expenses of \$7,291,436. The expenses in the current draft CRIS indicate aggregated (horticulture and grain) expenses of \$21,233,921 which indicate that the split between grain and horticulture is circa 66%/33%.
- GTA does not have access to the breakdown in revenue between horticulture and grain but would submit that over 90% of the revenue in an aggregated model being proposed would come from the grain export sector.

GTA requests that:

- The Cost Recovery Task Force demonstrates that the horticulture and grain sectors contribute on a proportionate basis to financing the new Plant Export Program.
- In the absence of verification, the grain export sectors will consider that there is cross subsidisation occurring between the horticultural and grain sectors.
- This being the case, then the Department is in breach of the Australian Government Cost Recovery Guidelines, as published by the Department of Finance which states on page 39 that:

The potential for cross-subsidisation among levy payers may increase if a levy rate does not bear a reasonable relationship to the cost driver of the activity.

In the absence of an objective statement from the Department defending the methodology that:

- the current fees and charges schedule remain in place.

² Cost Recovery Implementation Statement, Consultation Draft, Plant Export Certification, Section 3 – Changes to the Fee and Levy Structure, first paragraph, Page 8.

³ Department of Agriculture Cost Allocation Policy, page 1

5 The requirement for the independent verification of the process to set fees and charges

- The Cost Recovery Task Force claim that the expenses associated with the conduct of the newly formed Plant Export Program cannot be split on an activity basis between the grain program and horticulture program. Previous experience indicates otherwise.
- PricewaterhouseCoopers (PwC) was engaged by the Department of Agriculture, Fisheries and Forestry (DAFF) (on behalf of the Grain Ministerial Task Force) to undertake a Charges Review of the proposed 2011-12 fees. The cost of this project was circa \$60,000.
- The PwC review detailed the various cost centres across the Grain Export Program and allocated a set of fees and charges to cover the costs on a full cost recovery basis.
- The Executive Summary of the PwC Report states⁴ that:

This review is designed to determine whether the proposed fee structure is equitable across industry sectors with regard to the Australian Cost Recovery guidelines, and review the impacts on affected groups of grains exporters.

Overall the methodology undertaken by the Grains Ministerial Task Force to estimate the Grains Program costs, allocate those costs by activity type and determine fees to recover the costs of those activities appear to be compliant with the Cost Recovery Guidelines, based on the information that we have been provided.

- This process was evidence based and enjoyed the support of industry due to its transparency.

GTA requests that:

- The process adopted as part of the Grain Ministerial Task Force activities is repeated. Completion of such a review would clearly identify the costs associated with the conduct of the various components of the Grain Export Program and enable a set of fees and charges to be set accordingly.
- The cost of the review process is borne by the Grain Export Program.

In the absence of such a review, GTA would submit that:

- the current fees and charges schedule remain in place.

6 Fees and charges

- The Cost Recovery Implementation Statement – Consultation Draft – Plant Export Certification, 2015/16, states that the expenses for 2014/2015 for the Plant program will be \$30,145,250 (page 21). The forecast for expenses in 2015/2016 (page) is \$21,233,921. There is no rationale or explanation for this 30% reduction in expenses in one year. This type of reporting does not engender confidence in the financial robustness of the process.
- There have been multiple revisions to the fees and charges since the release of the Cost Recovery Implementation Statement – Consultation Draft – Plant Export Certification, 2015/16.

The best example being the reduction in the tonnage charge from a starting point of 22 cents per tonne to 20 cents to 16 cents to 15 cents in the last iteration of the fees and charges. The movement in this fee represents \$2,100,000. Changes in the Registration Fee for Registered Establishments is another example.

Clearly, these changes are not based off the expenses associated with conducting the activity within a particular commodity sector rather they are the Departments attempt to “shoe horn” a fee or charge into the fees and charges model in an attempt to satisfy the vested interests of the horticulture and/or the grain industry commodity groupings.

GTA submits that:

- Based off a complete lack of confidence in the methodology to determine the fees and charges that the current fees and charges schedule remain in place.

6 The draft CRIS is in breach of the Australian Government Cost Recovery Guidelines, July 2014

- The above Guidelines are published by the Department of Finance.
*"The Cost Recovery Guidelines set out the overarching framework under which government entities design, implement and review cost recovered activities provided on behalf of the Australian Government."*⁵
- further the Guidelines state that:
"There are two types of cost recovery charges:
 - **cost recovery fees**—fees charged when a good, service or regulation (in certain circumstances) is provided directly to a specific individual or organisation
 - **cost recovery levies**—charges imposed when a good, service or regulation is provided to a group of individuals or organisations (e.g. an industry sector) rather than to a specific individual or organisation."⁶
- and to make the point absolutely clear⁷:

Type of charge	Cost recovery fees	Cost recovery levies
Relationship between charges & costs	Reflect efficient unit costs of a specific good or service $R = E^*$	Reflect efficient unit costs of a specific good or service $R = E$

**R = revenue generated from the activity; E = expenses incurred in providing the activity.*

GTA submits that:

- the proposed fees and charges being proposed by the Cost Recovery Task Force **are in breach of the Australian Government Cost Recovery Guidelines, July 2014.**
- The above comment is based on any fair reading of the above quotes and taking into consideration the clear intention of the Guidelines to recover costs from the specific industry organisation or industry sector that received a specific good or service or obtained a benefit from the provision of a service or good.

Based on the above, GTA submits that:

- the current fees and charges schedule remain in place

7 GTA responses to departmental requests

In response to the following requests from the department by undated letter sent on 28 August 2015, GTA responds as follows:

DA request 1.

Acknowledge that it is government policy to fully recover for export certification activities, while agreeing that these costs should be minimised.

GTA response:

- Agree

⁵ Australian Government Cost Recovery Guidelines, para 8, page 4

⁶ Australian Government Cost Recovery Guidelines, para 4, page 2

⁷ Australian Government Cost Recovery Guidelines, Figure 1, page 3

DA request 2.

Indicate whether the new(alternative) model provides a charging structure that better supports and encourages new and smaller exporters, than current arrangements (noting that this implies that larger exporters, who make more use of the export system, will therefore pay a larger share of the costs).

GTA response:

- *GTA does not agree with this statement and submits that the setting of fees and charges are not an instrument of government policy to encourage new exporters into the industry.*
- *Further, this statement is at variance with the D of A Cost Recovery principles – Position paper, September 2014 which states:
“There should be no free riders and cross subsidisation by one sub-group of another should be minimised.”*
- *Subsidisation of new entrants by existing industry participants is inherently at odds with a market based economy that operates within Australia.*

DA request 3.

Indicate whether the new (alternative) model provides a more fair and reasonable means of allocating the costs among all users of plant export certification activities, than current arrangements.

GTA response:

- *GTA does not agree with this statement for the reasons detailed in this submission.*
- *GTA would submit that the opposite would apply, i.e. that the **current** fees and charges schedule **provides a more fair and reasonable means of allocating costs than the new (alternative) model.***

8 August 2015

Cost Recovery Task Force
Department of Agriculture
GPO Box 858
Canberra ACT 2601

Dear Sir/Madam,

Re: Cost Recovery Implementation Plan (CRIS) – Consultation Draft, Plant Export Certification

Grain Trade Australia provides this submission in response to the above document.

Grain Trade Australia (GTA) is the focal point for the commercial grains industry within Australia. It facilitates trade and works to provide an efficient, equitable and open trading environment by providing leadership, advocacy and commercial 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 standards and/or trade rules.

GTA members are drawn from all sectors of the grain value chain from production to domestic end users and exporters. GTA members are involved in grain trading activities, grain storage, grain for the human consumption and stock feed milling industries.

GTA also attracts membership from organisations to the side of the value chain in related commercial activities such as financial (banking, stock exchanges etc.), communications, grain advisory services, and professional services (e.g. solicitors and accountants).

Within this context, GTA provides comment on the abovementioned document.

Of particular interest to GTA members is the proposed 81%¹ increase in the tonnage fee. This fee represents 94% of the total fees charged to a bulk grain exporter² and hence is the major focus of this submission.

GTA members note that the objective information to justify this increase has not been presented to the industry.

GTA members look forward to continuing the dialogue with the Department to develop a transparent and equitable fees and charges model for the inspection and certification services conducted by the Department for the export grain sector.

Yours sincerely



Geoff Honey
Chief Executive Officer

¹ Page 11, "Key changes for grain & seed exporters include", CRIS Consultation Draft, page 11

² Page 12, "Wheat Exporter scenario", CRIS Consultation Draft, page 12

1 Executive Summary

Confidentiality

- Grain Trade Australia is the recipient of detailed financial information released by the Department however is bound by the Department's CONFIDENTIALITY AGREEMENT. Hence, this submission can only comment on information publicly available.
- Grain Trade Australia will submit a supplementary IN CONFIDENCE submission that will comment on this detailed information relating to the conduct of the Grain Export Program.

Aggregating operation of the grain & horticulture export program

- The conduct of the inspection and certification of export grain and horticulture is conducted within the same operational environment on the basis of cost efficiencies to the Department.
- The expense split between grain and horticulture is not objectively based but is made on an arbitrary basis by the Department.

GTA submits that:

- The perceived or actual issue of cross subsidisation between grain and horticulture export program functions has not been adequately explained by the Department.
- Grain and horticulture are not a "logical aggregation of agency items"³
- The Grain Export Program should be conducted as stand-alone program to ensure financial probity and accountability to the grain export sector. This would ensure only grain expenses are subject to full cost recovery from grain exporters.

Expenses

- Despite assurances to the contrary, costs following the introduction of the Grain Export Certification Reform Program in 2012 have increased substantially.
- The justification of the quantum of expenses must be the start point for the determination of fees and charges.
- However, the Departments start point is that expenses are a given and that fees and charges have to be developed to match the increase expenses.

GTA submits that:

- DA Biosecurity explain:
 - why expenses have increased at a time when activities have moved from the Department to industry e.g. with the adoption of Authorised Officers (AOs), expenses should have dropped. However, the opposite has occurred, i.e. costs have increased.
 - how the proposed new Cost Base can be justified.
 - what measures are, or can be put, in place to guarantee that whatever is the final new Cost Base that it will not blow out in the first or subsequent year(s) after the new CRIS is finalised (e.g. similar to the 2011 CRIS experience).

Proposed fees and charges

- The tonnage fee is responsible for the bulk of the revenue raised within plant operations and DA Biosecurity has proposed to increase this fee by 81%.

GTA submits that:

- The tonnage fee is being used to top up revenue to cover expenses as per the previous section - Expenses
- The fee increase has not been justified by the Department and must remain at the present 11 cents per tonne and not increase to the proposed 20 cents per tonne.

Authorised Officer Annual Registration Fee

GTA submits that:

- This new fee must support Authorised Officers by continual updating the guidelines, work instructions and training material for AOs for the purposes of undertaking inspection of commodities.

³ Department of Agriculture Cost Allocation Policy

2 Strategic Analysis – the issues

Grain exports - value to the national economy

- The export grain industry is worth \$10 - \$12 billion dollars per year to Australia.
- The export horticulture industry is worth \$1.2 billion⁴

Grain & Plant Product Export Industry Consultative Committee

- Grain Trade Australia (GTA) is a member of the Department of Agriculture Biosecurity (DA Biosecurity) Grain & Plant Product Export Industry Consultative Committee (GPPEICC).
- GPPEICC is the formal Consultative Committee for DA Biosecurity to interact and receive grain and plant product input/commentary into the activities of the grain and plant product export program from Australia.

Cost recovery as per Government policy and definition of a “program”

- The DA Biosecurity operates its functions on a full cost recovery basis. The DA Biosecurity Cost Recovery Guidelines states that:
“A cost centre reflects a function or the nature of work within the organisational structure at or below section level; it is the base level for budgeting and reporting. Cost centres encapsulate a particular function and need to be specific enough so that they can map to section, outcome and program as well as providing a systemic way of capturing financial information which then enables consolidation for financial reporting.
- A **program** as defined in the Cost Recovery Guidelines as “a logical aggregation of agency items for the provision of adequate information for key performance monitoring and measurement of deliverables.”
- The plant and plant product export **program** operates as a cost centre within DA Biosecurity and is responsible for conduct of the grain and horticulture export programs, i.e. there is substantial shared services (inspection services through to administration of the certification process) between the two commodity groups.
- *The issue(s):*
 - *Allocation of expenses – is it aligned to the provision of services to that commodity group or is their cross subsidisation?*

Competition for the provision of services

- DA Biosecurity is responsible for conducting the inspection and certification activities as the National Plant Protection Organisation (NPPO) as defined in the International Plant Protection Convention (IPPC).
- The IPPC is an international intergovernmental agency which is, amongst other activities, responsible for developing inspection and certification guidelines for member countries. Australia is a member and quite correctly as a good international citizen adheres to these guidelines/processes.
- *The issue(s):*
 - *The services to enable inspection and certification for export grain is conducted by DA Biosecurity in a largely non-competitive environment.*
 - *DA Biosecurity must account to industry major variances against expected financial performance in a public manner.*

Grain Export Certification Reform Process – an outcome was that costs were transferred to industry

- DA Biosecurity via the Grain Export Certification Reform Process (GECRP) completed in 2012, introduced a number of key reforms which did add substantial flexibility to the process and add a layer of competitive pressure in the form of the provision of services for Authorised Officers.
- The GTA CEO was the Chairman of the GECRP and was instrumental in promoting the reforms to industry
- A key feature of these reforms was that a number of services conducted by DA Biosecurity were transferred to industry. This particularly applies to the inspection process via the Authorised Officer (AO) program. The AO Program has been hugely successful with over 900 trained industry Authorised Officers across Australia.
- GTA grants the AO program has added flexibility to the inspection process, but it came at a major cost to the grain industry.

⁴⁴ DA website “Horticulture Fact Sheet”

- *The issue(s):*
 - *Industry adopted the AO program on the basis that the costs to conduct the overall export program within the DA Biosecurity would decrease and be reflected in reduction in fees and charges⁵.*

GECRP model based on grain as a stand-alone commodity for financial reporting

- Another key outcome was the complete review of DA Biosecurity's charging model conducted by PriceWaterhouseCoopers which in the first instance determined the costs of all the major activities of the Department.
- This review resulted in the introduction of a new fee and charges model that was largely based on the user pays, with the socialisation of minor activities such as some travel and accommodation where fee recovery was outweighed by the costs of identification/administration.
- Grain Trade Australia was a strong supporter of this approach and the resulting fees and charges, as evidenced by our participation with the Department in a pan Australia workshop program to the grain industry.
- This fee and charges model was accepted by the grain industry as fair and equitable and importantly was grain specific, i.e. there was no contamination of the financial data via involvement of other commodities.
- *The issue(s):*
 - *The aggregation of grain with horticulture would appear to suit DA Biosecurity at the expense of the grain industry.*

Is grain and horticulture a natural fit for financial reporting?

- The new model being proposed is based on shared services between grain and horticulture where the costs allocation to the respective programs is apportioned in an environment that could only be described as "dark art", i.e. there is no objectivity that can be displayed by DA Biosecurity.
- Grain either in bulk or container is high volume with a small number of sub commodity categories, i.e. wheat, barley, sorghum, canola etc. A major component is the tonnage fee which is proposed to increase by 81%.
- Horticulture is small volume and multi commodity specific, i.e. cut flowers to rhubarb and everything in between.
- *The issue(s):*
 - *Grain affords substantial cost efficiencies in regards to inspection and certification that is not available to the horticulture industry. The question that arises and not answered in an objective manner is whether there is cross subsidisation between these commodity groups?*

Costs have increased versus the Departments financial modelling

As part of the Grain Export Certification Reform Program (GECRP) a major piece of work related to introduction of substantial changes and innovations in the service delivery model aligned to a review and introduction of new fees and charges as follows:

*"For the grain and seed export industry these reforms have culminated into a new service delivery model. The new service delivery model continues to ensure that the safety, suitability and integrity of Australian grain, seed and grain products destined for export markets are produced to a high standard while delivering substantial efficiencies across the export supply chain. **These efficiencies will ultimately lead to less regulatory cost to exporters without compromising their access to export markets.**"*

Reference: DAFF - Cost Recovery Impact Statement (CRIS), page 2, dated 14 November 2011

Reform areas included the introduction of industry Authorised Officers, movement from manual to electronic permits and certificates; and a program of streamlining and removing duplication of many time consuming processes and documentation. These reforms have been both demonstratively successful in implementation and uptake but also **have the effect of shifting significant cost from the Department to industry.**

As noted above, industry expected that ***"These efficiencies will ultimately lead to less regulatory cost to exporters"***.

⁵ DAFF - Cost Recovery Impact Statement (CRIS), page 2, dated 14 November 2011

GTA is a member of the Department of Agriculture Biosecurity Grain & Plant Product Export Industry Consultative Committee and is bound by a CONFIDENTIALTY AGREEMENT regarding the disclosure of detailed financial information relating to the Grain Export Program.

However, what can be stated is that the following issues are apparent:

- costs for inspection and certification have been moved to industry as planned; and
- ***“less regulatory cost to exporters”*** has not occurred, in fact quite the opposite with a proposed 81% increase in the tonnage levy. Refer following table.

The above dot point is further emphasised in the scenario detailed in the CRIS Consultation Draft identified on page 12 for a wheat exporter who operates a bulk grain facility with 24 consignments per year. For this organisation the increase in total fees and charges is 76% over current levels.

- *The issue(s)*
 - *Expenses have done the opposite of what was expected by industry and the Department going on both the CRIS forecasts and the reform program. The reasons behind these results have not been made available to the industry.*

The starting point for this discussion needs to shift

The starting point for the determination of fees and charges is to determine why expenses have not reduced but increased. The view from the grain industry as to why expenses have increased is an amalgam of:

1. the Department has not adjusted its staffing regime to suit the new inspection and certification conditions; and/or
 2. incorrect allocation by staff in their effort allocation surveys; and/or
 3. the grain program is incurring additional costs from other Biosecurity commodity programs, especially horticulture which is bracketed with grain in plant export arrangements.
- *The issue(s):*
 - *Focus on expense of conducting the program rather than defaulting to immediately increasing costs to industry.*

Plant Export Certification – comparison between current and proposed annual fees & charges

	Current	Proposed	DA Biosecurity commentary – fees and charges		GTA comment, if required
			Existing categories	New categories	
Registered establishments					
			There will be two levy rates for registered establishments. Simple (\$2 500 per annum) and complex (\$5 000 per annum).	Applications for new registered establishments will now incur a \$600 levy.	<ul style="list-style-type: none"> New fee to process applications of \$600.
Registered establishments / container	\$2,500	\$2,500 (simple)			<ul style="list-style-type: none"> Minor change to fee for complex reg. establishments of \$700. Affects bulk export terminals only. Not material.
Registered establishments / bulk	\$4,300	\$5,000 (container)	Complex reg. levy will apply to establishments exporting to protocol markets & bulk grain facilities exporting to non-protocol markets.	<ul style="list-style-type: none"> 	

	Current	Proposed	DA Biosecurity commentary – fees and charges		GTA comment, if required
			Existing categories	New categories	
Volume levies	11 cents / tonne	20 cents / tonne	The low rate will reduce progressively to \$0.15 per tonne in 2017-18.		<ul style="list-style-type: none"> • 81% increase in volume levies • In the CRIS scenario (page 12) for a bulk wheat exporter, the tonnage charge at 20 cents per tonne represents 94% of total costs. • The increase in the tonnage fee is the issue. • Volume levies fund the non cost recoverable aspects of the program, such as Canberra based management/administration, IT systems, shared services. • A major component are full time equivalent positions (FTEs). • Assumptions: <ul style="list-style-type: none"> • hay continues as volume paying commodity; and • timber becomes a volume paying commodity • Focus of attention: <ul style="list-style-type: none"> • costs of conducting the program • FTEs • administrative costs • shared services and the arbitrary split between the grain and horticulture program.
Inspection & audit	\$36 per 15 mins.	\$30 per 15 mins.		<ul style="list-style-type: none"> • Where an exporter could use an authorised officer but instead chooses to use a departmental officer, the inspection cost will be \$75 per 15 mins. • If an exporter does not have the option of an authorised officer (for example, protocol markets) this cost will be \$30 per 15 mins. 	<ul style="list-style-type: none"> • Designed to encourage use of industry authorised officer, except into protocol markets as noted in previous column.
Export permits & certificates	\$16 per copy	\$7 per copy			

	Current	Proposed	DA Biosecurity commentary – fees and charges		GTA comment, if required
			Existing categories	New categories	
Phytosanitary certificates		\$43 per copy		<ul style="list-style-type: none"> Proposed that the levy will decrease to \$41 in 2016-17 	
Authorised officers				<ul style="list-style-type: none"> Costs for the authorised officer programme should be recovered from clients using this service. 	<ul style="list-style-type: none"> Cost for the training of authorised officers has been socialised across the program for the last four years. There was no charge to complete the training program. In 2013, it was announced that funding for the program would cease. Costs to the Department for the AO program should be on a user pays basis and not socialised.
Annual reg. fee	\$0	\$750		<ul style="list-style-type: none"> To recover the costs of administering the authorised officer programme on a full cost recovery basis with zero socialisation of costs. 	<p>This new registration fee for Authorised Officers must support them by continual updating the:</p> <ul style="list-style-type: none"> guidelines, work instructions and training material for AOs for the purposes of undertaking inspection of commodities; MICor database.
Assessing new applications	\$0	\$250		<ul style="list-style-type: none"> The introduction of a price signals in the conduct of the AO program will ensure that departmental training resources are subject to market forces. 	<ul style="list-style-type: none"> New fee to process applications of \$250
Training & assessment	\$0	\$1750 and \$2000			<ul style="list-style-type: none"> New fee to cover costs of conducting the training program.
Approval / administration - following successful assessment	\$0	\$250			<ul style="list-style-type: none"> To cover costs of administration of certifying AOs including completion of a Deed of Arrangement between the Commonwealth of Australia and the AO.

8 August 2015

Cost Recovery Task Force
Department of Agriculture
GPO Box 858
Canberra ACT 2601

Dear Sir/Madam,

Re: Cost Recovery Implementation Plan (CRIS) – Consultation Draft, Plant Export Certification

Grain Trade Australia provides this supplementary submission that comments on financial information supplied in CONFIDENCE to the members of the Grain & Plant Product Export Industry Consultative Committee.

This submission builds on the issues noted in the GTA public submission and will not be repeated in this submission, unless required to add context/reinforce the argument.

GTA is a member of the GPPEICC Finance subcommittee and participated in a number of meetings on this issue, the most recent meeting held on Monday 20 July 2015 in Canberra.

At this meeting, a number of issues were debated by industry and DA Biosecurity staff which included members of the Department's Cost Recovery Task Force.

It was GTA's understanding that as a result of the meeting there would be a number of amendments to the Draft CRIS that was tabled at that meeting. I confirmed the major outcomes of that meeting by way of email dated 21 July 2015 that was not refuted and which we believe was accepted as an accurate account of the meeting.

However, it is disappointing that the major amendment, i.e. the tonnage charge has only been reduced by 2 cents per tonne from 22 cents to 20 cents per tonne. The current charge is 11 cents per tonne.

The proposed charge at 20 cents per tonne represents an **81%¹ increase in the tonnage fee**. Furthermore, the tonnage fee, on the Department's admission², represents **94% of the total fees charged to a bulk grain exporter and hence is the major focus of this submission**.

This submission draws on my email of 21 July 2015, which confirmed the key meeting outcomes. Also, it will be taken that the reviewers of this submission have a deep understanding of the operations of the Grain Export Program and associated activities such as the Grain Export Certification Reform Program (GECRP) and hence ancillary explanation is not required in this submission.

GTA repeats that we look forward to continuing the dialogue with the Department to develop a transparent and equitable fees and charges model for the inspection and certification services conducted by the Department for the export grain sector.

Yours sincerely



Geoff Honey
Chief Executive Officer

¹ Page 11, "Key changes for grain & seed exporters include", CRIS Consultation Draft, page 11

² Page 12, "Wheat Exporter scenario", CRIS Consultation Draft, page 12

Opening comments:

- The Grain Export Certification Reform Program (GECRP) developed a fees and charges model that was agreed and sold to industry members by our respective trade organisations. Grain Trade Australia was prominent in this promotion to industry as the Chair of the GECRP and attendance at the Department's workshops which were held nationwide.
- This level of industry support from Grain Trade Australia was critical to the implementation by the Department of the reforms being introduced.
- The development of an accurate fees and charges model by PriceWaterhouseCoopers was a major reform initiative as it completely transformed the financial accounting within the Grain Export Program and critically introduced new fees and charges to industry.
- In regards expenses, it clearly detailed where costs lay within the Grain Export Program. Financial analysis was carried out on all major activities such as the cost to do an inspection, the administration to issue a certificate or indeed print a replacement certificate. Fees then matched these expenses. The model was fair and equitable.
- Tellingly, the expectation of the CRIS developed at the time and embedded in the Ministers Press Release at the time was that with the movement of activities from the Department to industry that the expense of conducting the Grain Program would decrease. This has not occurred as noted in the letter from industry dated 6 May 2015. This theme was more fully explored in the GTA public submission.
- The major aspects of the draft proposal discussed at the meeting on 20 July 2015 were as follows:
 - Expenses:
 - to conduct the Horticulture/Grain program is circa \$21m. The grain share of the \$21m is not objectively determined, though 75% seemed to be a percentage that the Cost Recovery Task Force was working.
 - Revenue:
 - the tonnage fee was to double from 11 to 22 cents per tonne.
 - introduction of a new annual fee Registration Fee for Authorised Officers of \$1531.
 - revamped Establishment Registration fees.

Expenses or revenue – what should be the primary focus?

- The Department has focused on the revenue required to conduct the program.
- However, industry is of the view that the cost of conducting the Grain and Horticulture program and the increasing costs must be the focus. Current expenses as noted above are circa \$21 m.
- The issue as to why costs have risen are many and varied but a major issue would be that Full Time Equivalents (FTEs) have actually increased not decreased as per the original CRIS and are reflected in the following table which draws on DA Biosecurity briefing papers³.

	CRIS	11/12	12/13	13/14	14/15
D of A Resourcing	84	122	141	133	122
AO uptake	0	133	360	688	858

- Notes on table:
 - AOs have increased from 0 to 858 at a substantial cost to industry.
 - D of A resourcing is still at 11/12 levels. The implication is that the Department has not adjusted their resources to the changing operating environment.

GTA requests that:

- DA Biosecurity provide an explanation to industry as to why expenses have not reduced in line with expectations but have actually increased.

³ Analysis of Grain Export Program Costs, Resourcing and Demand for Services, undated

Shared services with horticulture

- GTA repeats the comments in the public submission, that this issue is a cause of tension as to an accurate allocation of expenses between grain and horticulture.

GTA requests that:

- Grain be treated as a stand-alone commodity in the same manner as meat or dairy.

Programme Management & Administration

- While the Department have been forthcoming with aggregated numbers in their workings, expenses, and to use an example, such as depreciation at over \$500,000 can't be verified or agreed by industry.
- DA Biosecurity Cost Recovery Force members noted that it would be impossible for independent verification to take place due to the shared services arrangements that operate within the Department. GTA begs to differ.
- The Grain Export Program **was** independently audited and reviewed by a commercial provider during the Grain Export Certification Program.

GTA requests that:

- the expenses of the Grain Export Program are independently audited by an organisation such as the Australian National Audit Office or commercial provider and that the results of the audit be shared with the GPPEICC to verify that the aggregated expenses accurately reflect the expenses incurred by the grain sector.

Agreed outcomes – meeting 20 July 2015

The following issues were discussed and outcomes were as follows:

- proposed fees and charges for Registered Establishments - agreed
- The Authorised Officer annual registration fee was not agreed and industry comment was that should it be introduced then it needs to be at a substantially reduced amount. This has occurred with a proposed amount of \$750.
- The Authorised Officer training and assessment costs were to be on a full cost recovery basis from the users of the training and accreditation. These costs were originally account the Grain Export Program. Placing the AO program on a full cost recovery basis to the users of the service will, on the Department's figures, remove \$3m from the budget for the Grain Export Program.
- Based on the above, the DA Biosecurity financial model indicated that:
 - the tonnage fee could be held at 11 cents per tonne; and
 - that with the reduction in FTE as per the tabled Draft CRIS, expenses to conduct the Grain Export Program will be reduced to \$12.9m as noted in the following table.

Issue		AUD Millions
Proposed expenses as per the CRIS		\$21.2
Minus the Horticulture share of 25% of total expenses	\$5.3	
Grain share of total expenses		\$15.9
Minus cost of Authorised Officer program	\$3	\$12.9
Expenses required to conduct the Grain Export Program		\$12.9

GTA requests that:

- The tonnage fee remains at 11 cents per tonne as there is no identifiable justification for this fee to be increased.
- The financial outcomes discussed and agreed by industry at that meeting and as noted above are reinstated and that these expenses be used to develop a fair and equitable fees and charges schedule for the conduct of the Grain Export Program.

Membership List as at 23 June 2015

Organisation	Contact	Website /Phone
Ordinary Member (Trading)		
Level A1 (over 7 Million Tonnes)		
Cargill Australia Limited	Ms Penne Kehl	cargill.com.au
Co-operative Bulk Handling Limited	Mr Jason Craig	cbh.com.au
Glencore Grain Pty Ltd	Mr David Mattiske	glencoregrain.com.au
		3
Level A2 (5 - 7 Million Tonnes)		
		0
Level A3 (3 - 5 Million Tonnes)		
ADM Trading Australia Pty Ltd	Mr Tim Henry	adm.com
Emerald Grain Pty Limited	Mr John Warda	emeraldgrain.com
Graincorp Operations Ltd	Mr Neil Johns	graincorp.com.au
		3
Level A4 (1.5 - 3 Million Tonnes)		
PentAg Nidera Pty Ltd	Mr David Lengren	pentagnidera.com.au
		1
Level B1 (1.0 - 1.5 Million Tonnes)		
Bunge Agribusiness Australia Pty Ltd	Mr Chris Aucote	bunge.com/Agribusiness
Louis Dreyfus Australia	Mr Phil Coffin	louisdreyfus.com.au
		2
Level B2 (500,000 - 1 Million Tonnes)		
Agrex Australia Pty Ltd	Mr David Johnson	agrexaustralia.com.au
George Weston Foods Limited	Mr Mark O'Brien	gwf.com.au
Inghams Enterprises Pty Limited	Mr Greg McDonald	ingham.com.au
Mitsui and Co (Australia) Ltd	Mr Kane Fukuoka	mitsui.com
Plum Grove Pty Ltd	Mr Tony Smith	plumgrove.com.au
Ridley Agriproducts Pty Ltd	Mr Michael Reeves	agriproducts.com.au
Riverina (Australia) Pty Ltd	Mr Jon Mulally	riverina.com.au
		7
Level B3 (250,000 - 500,000 Tonnes)		
Agracom Pty Ltd	Mr Joe Hallman	agracom.com.au
Arrow Commodities Pty Ltd	Mr Dominic Vanzella	arrowcom.com.au
Australian Grain Growers Co-operative Limited	Mr Simon McNair	aggcoop.com.au
Centre State Exports Pty Ltd	Mr Jeff Voigt	centrestateexports.com.au
Chinatex Australia Pty Ltd	Mr Jiling Lai	02 9957 2688
COPRICE	Ms Kirsty Cutter	coprice.com.au
Lempriere Grain Pty Ltd	Mr Jonathon Holdsworth	lemprieregrain.com.au
Riordan Grain Services	Mr Bradley Hogan	riordangrains.com.au
Special One Grain	Ms Jaimee Carrigan	specialonegrain.com.au
United World Enterprises Pty Ltd	Mr Jimmy Liu	uwetypical.com
Wilmar Gaviola Pty Ltd	Mr Matt Albion	07 3713 8700
		11

Ordinary Member (Trading) (contd)

Level C (under 250,000 Tonnes)

A & B Grains Pty Ltd	Mr Rod Wolski	abgrains.com.au
A T Waterfield & Son Pty Ltd	Mr Brad Waterfield	03 5382 3725
A W Vater and Co	Mr Kim Vater	vater.com.au
Adams Australia Pty Ltd	Mr Ian Mack	adamsaustralia.com.au
Agmark Commodities	Mr Jack Vivers	agmark.com.au
Agri Om Australia Pty Ltd	Mr Kishore Bulchandani	agriom.com.au
Agri-Oz Exports Pty Ltd	Mr Francois Darcas	03 9830 7021
Agriex Australia Pty Ltd	Mr Joseph Khnessier	02 9232 0690
Agrifoods Australia	Mr Rob Anderson	agrifoodsaustralia.com.au
AGRIGRAIN	Mr Jeremy Brown	agrigrain.com
Agripark	Mr John Randell	mgas.com.au/grainpacking
Allied Mills	Mr Simon Gelling	alliedmills.com.au
AMPS Agribusiness Group	Mr Stuart Maidment	ampsagribusiness.com.au
Associated Grain	Mr Todd Jorgensen	07 4662 1999
Auscott Ltd	Mr Peter Webb	auscott.com.au
Ausrealt International Pty Ltd	Mr Robin Luo	ausrealt.com.au
Australia Milling Group Pty Ltd	Mr Russell Greening	aumg.com.au
Australian Grain Export Pty Ltd	Mr Grant Roesler	08 8832 2800
Australian Grain Storage	Mr Matt Bailey	sunrice.com.au
Australian Growers Direct Pty Ltd	Mr Jamie Smith	ausgrowersdirect.com.au
Avigrain Produce	Mr Dennis Ward	avigrain.com.au
Baker Grain	Mr Richard Baker	bakergrain.com.au
Barooga Agriproducts	Mr Andrew Leighton-Daly	03 5875 2202
Berriwillock Grain Storage Co-Operative Ltd	Mr Tony Bellinger	moulameingrain.com
Big River Feeds Pty Ltd	Mr Bjorn Ludvigsen	08 8532 4434
Blairs Produce Company	Mr Sean Blair	02 6025 4600
Blue Ribbon Seed and Pulse Exporters	Mr Stephen Donnelly	07 3720 1900
Boort Grain Co-Operative	Mr Tony Bellinger	03 5455 2600
Broadbent Grains	Mr Geoff Barker	rvbroadbent.com
Broun and Co Grain Pty Ltd	Mr Wal Broun	brounandco.com.au
Bungulla Farming Pty Ltd	Mr Brad Jones	08 9637 1164
C & S Trading Pty Ltd	Mr Craig Scholz	scholzbh.com.au
C K Tremlett Pty Ltd	Mr Andrew Tremlett	08 8524 9050
Cameron Pastoral Company Pty Ltd	Ms Ross Stephens	07 4671 4144
Carpendale Commodities & Transport Pty Ltd	Mr Andrew Kluck	07 4676 1245
Castlegate James Australasia Pty Ltd	Mr Dominic Hogan	castlegatejames.com.au
CHS Trading Company Australia	Mr Jon Bucknall	chsinc.com.au
Cleveland Agriculture	Mr Chris Hurwood	02 6756 5004
Commex International Pty Ltd	Ms Mariam Boulos	02 9531 7341
Coorow Seeds	Mr Brian Pover	coorowseeds.com.au
Cremer Australia Pty Ltd	Mr Brendan Macauley	cremer.de
D & M Stockfeeds	Mr Robert Danieli	dmstockfeeds.com.au
DA Hall and Co	Mr Bruce Holden	07 4695 5777
Dalby Bio-Refining Limited		dbrl.com.au
Dalgrains (Qld) Pty Ltd	Mr Tobin Cherry	dalgrains.com
Darwalla Milling Co Pty Ltd	Mr Gary Heidenreich	07 3822 0527
Deacon Seeds Company	Mr Terry Deacon	07 4662 3217
Deckert Group Pty Ltd	Mr Chris Deckert	deckerts.com.au
Defiance Maize Products Pty Ltd	Mr Rodney Walker	corson.co.nz
Demeter Cormack Pty Ltd	Mr David Oates	08 6389 0098
Direct Commodities Pty Ltd	Mr Hamish Robertson	directcommodities.com.au
Direct Feeds Australia Pty Ltd	Mr Sam Vale	03 5853 1744
Donnellons Bulk Haulage Pty Ltd	Mr Bill Donnellon	0428 136 483
East Coast Stockfeed Pty Ltd	Mr Stuart Dolden	ecsf.com.au
Export Trading Group Australia Pty Ltd	Mr Shayne Clark	etgworld.com

Level C (under 250,000 Tonnes) cont.

Feed Central Pty Ltd	Mr Tim Ford	feedcentral.com.au
Fellows Nominees	Mr Paul Fellows	fellowsbulk.com.au
FertInvest Pty Ltd	Mr Preyesh Barar	fertinvest.com
Fletcher International Exports Pty Ltd	Mr Jake Young	fletchint.com.au
Free Eyre Grain Pty Ltd	Mr Mark Rodda	free-eyre.com.au
Golden Harvest Grain Exports	Mr Chandru Hiremath	goldenharvest.net.au
Goldman Sachs Financial Markets Pty Ltd	Mr Nick Carracher	gs.com.au
Goodman Fielder Limited	Mr Alex Krzanic	goodmanfielder.com.au
Grain Direct Australia	Mr Sam Christensen	graindirect.com.au
Grain Link (NSW) Pty Ltd	Mr Paul Pearsall	02 6962 9500
Grain Link WA Pty Ltd	Mr Andrew Goyder	grainlink.com.au
Grainforce Pty Ltd	Mr Derek Larnach	02 6331 4880
Grainpro Pty Limited	Ms Angela Greenhalgh	grainpro.com.au
Greentree Farming	Mr David Brown	02 6751 1228
GrainTrend Pty Ltd	Mr Sanjiv Dubey	graintrend.com
Grenfell Commodities Pty Ltd	Mr Trevor Mawhinney	grenfellcomm.com.au
GV Grain & Fodder	Ms Joanne Harry	03 5828 3063
Hanlon Enterprises Grain	Mr Peter Gerhardy	02 6924 1781
Hassad Australia Operations Company Pty Ltd	Mr James Carson	02 8019 7150
Iloura Resources Pty Ltd	Mr Hans Hol	iloura-resources.com
Independent Grain Handlers Pty Ltd	Mr Brad Bryant	igh.net.au
Irwin Stockfeeds	Mr Bryan Irwin	irwinstockfeeds.com.au
J K International Pty Ltd	Mr Sandeep Mohan	jki.com.au
James Stock Feed and Fertilizer Pty Ltd	Mr Adrian Moule	jamesstockfeed.com.au
Jerilderie Grain Storage & Handling	Mr David Barlow	03 5886 0344
K M & W M Kelly & Sons	Mr Chris Kelly	kellygrains.com.au
Kangaroo Island Pure Grain Pty Ltd	Ms Emma Tonkin	kipuregrain.com
Kennett Rural Services Pty Ltd	Mr Andrew Kennett	kennetttrural.com.au
Lachlan Commodities Pty Ltd	Mr Tony Cogswell	02 6851 2077
Laharum Bulk Handling Co	Mr Donald Carter	03 5381 2666
Lake Grain Pty Ltd	Mr Derek Davis	lakegrain.com.au
Lane Grain Pty Ltd	Mr Garry Lane	02 6887 3309
Langdon Grain Logistics	Mr Adrian Murphy	langdongrainlogistics.com.au
Laragon Almond Processors Pty Ltd	Mr Mark Webber	laragon.com.au
Laucke Flour Mills P/L	Mr Roger Laubsch	laucke.com.au
LDC Enterprises Australia Pty Ltd	Mr Richard Porter	07 3253 5999
LPC Trading Pty Ltd	Mr Simon Langfield	02 6383 7222
Mahony's Transport Services	Mr Anthony Foster	mahonystransport.com.au
Malteurop Australia Pty Ltd	Mr Jack King	03 5277 1950
Marubeni Australia Ltd	Mr Tom Tokunaga	marubeni.com
Matthews Transport and Grain Traders	Mr Neville Matthews	08 9831 1021
Max Grains Pty Ltd	Mr Jack Fahy	maxgrains.com.au
MC Croker Pty Limited	Mr Greg Carroll	crokergrain.com.au
Melaluka Trading Pty Ltd	Mr Simon Pritchard	melalukatrading.com.au
Mellco Pty Ltd	Mr Steve Mellington	0419 867 971
Moore Bulk Storage	Mr Daryl Moore	moorestorage.com.au
Moulamein Grain Co-Operative Ltd	Mr Tony Bellinger	moulameingrain.com
Mountain Industries Pty Ltd	Mr Keith Morgan	mountainindustries.com.au
Moxey Farms Pty Limited	Mr Peter Philipzen	0407 103 158
MSM Milling Pty Ltd	Mr Peter MacSmith	02 6364 5999
Murrumbidgee Grains Pty Ltd	Mr Peter Hassell	02 6937 9100
Namoi Cotton Co-Operative	Mr Shane McGregor	namoicotton.com.au
Nandaly Grain Co-Operative Ltd	Mr Tony Bellinger	03 5078 1217
Network Grains Pty Ltd	Mr Craig Dennis	07 4637 8500
Newcastle Agri Terminal Pty Ltd	Mr Jock Carter	02 4962 4006
Noble Resources Australia Pty Ltd	Mr Ian Dalgleish	thisisnoble.com

Level C (under 250,000 Tonnes) cont.

Northern Riverina Grains Pty Ltd	Mr Tony Bellinger	03 5032 2553
OOMA Enterprises NSW Pty Limited	Mr Malcolm Berry	oomaenterprises.com.au
Origin Grain Pty Ltd	Mr Peter Brick	03 5720 8500
PB Seeds Pty Ltd	Mr Peter Blair	pbseeds.com.au
PeaCo	Mr Shane Wall	03 5497 1766
Pearson's Grain Pty Ltd	Mr Darren Pearson	pearsonsgroup.com.au
Pentarch Grain Pty Ltd	Mr David Hanrahan	pentarch.biz
Peters Commodities Pty Ltd	Mr Michael Oxley	petcom.com.au
PGS (SA) Pty Ltd	Mr Darren Pilgrim	pilgrimgrainstore.com.au
Phoenix Commodities (Australia) Pty Ltd	Mr Jogesh Virk	07 35 537 111
Preston Grain	Mr Andrew Kell	02 6977 1733
Premium Grain Handlers P/L	Mr John Orr	pgh.com.au
Pulse Association of the South East (PASE) Inc	Ms Leanne Burr	08 9071 3655
Quadra Commodities Pty Ltd	Mr Andrew Jackson	quadra.com
Quirindi Grain & Produce	Mr John Webster	02 6746 1911
Redrock Corporation (NSW) Pty Ltd	Mr Jason Tetley	0418 866 843
Regal Seed & Grain P/L	Mr Damien White	regalseed.com.au
Reid Stockfeeds Pty Ltd	Mr Ian Reid	reidstockfeeds.com.au
Rivalea (Australia) Pty Ltd - Animal Nutrition	Mr Andrew Philpotts	rivalea.com.au
Riverina Oils & BioEnergy Pty Ltd	Mr Joe Fealy	riverinaoils.com
Robinson Grain Trading Co Pty Ltd	Mr Gary Robinson	robinsongrain.com.au
Roty Grain Store	Mr Brian Newman	02 6988 8221
Ruddenklau Grain Pty Ltd	Mr Tim Ruddenklau	08 8842 1314
Rural Logic (Aust) Pty Ltd	Mr Michael Wood	rurallogic.com.au
SANWA Pty Ltd	Mr Charles Emerson	sanwa.com.au
Seedhouse Tasmania	Mr Matthew Crane	seedhouse.com.au
Shannon Bros Bulk Haulage	Mr Clayton Shannon	03 5390 2264
Silo Bag Grain (NSW QLD) Pty Ltd	Ms Lesley Kilby	02 6847 1788
Societa Cofica Pty Ltd	Mr Dia Ram Sharma	societacofica.com.au
Southern Cotton Trading Pty Ltd	Mr Chris Veness	02 69 552 779
Southern Cross Agricultural Exports P/L	Mr Matthew Barnes	0427 876 643
Southern Grain Storage Pty Ltd	Mr Campbell Brumby	03 5267 2351
Southern Stockfeeds (Operations) Pty Ltd	Mr Brendan Maher	03 5437 8295
Starcom Grain Pte Ltd	Mr Ajay Aggarwal	+65 6336 7288
Sumitomo Australia Pty Ltd	Mr Tsuyoshi Osumi	sumitomocorp.com.au
Summer Hill Grains	Mr Barney Hughes	0428 694 363
Tamma Grains	Mr Kim Packer	tammagrains.com.au
Tasmanian Agricultural Producers Pty Ltd	Mr David Skipper	tasagproducers.com.au
Tasmanian Stockfeed Services P/L	Mr Trevor Macleod	tasstockfeed.com.au
Thallon Grains Pty Ltd	Mr Andrew Earle	02 6756 5004
Twynam Pastoral Company	Ms Ella Shannon	02 9325 9000
Unigrain Pty Ltd	Mr Ervin Leong	unigrain.com.au
Unique Grain Management Pty Ltd	Mr Mark Thiele	uniquegrain.com.au
W B Hunter Pty Ltd	Mr Stewart Coombes	03 5821 5744
Ward McKenzie Pty Ltd	Mr Mal Parkhill	mckenziefoods.com.au
Whitty Produce	Ms Marsha McMonigle	03 5721 6588
Whyalla Beef Pty Ltd	Mr Gino De Stefani	whyallabeef.com.au
Wilken Grain	Mr Richard Wilken	wilkens.com.au
Wimpak Export Company Pty Ltd	Ms Jo Cameron	wimpak.com.au
XLD Grain Pty Ltd	Mr Lachie Stevens	xldgrain.com.au

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Transport Operator

Gehrke Grains and Transport Pty Ltd	Mr Julian Gehrke	07 5465 6695
Wakefield Grain Export Services	Mr Steve Fallon	wakefields.com.au

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Broker

Large

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Medium

Allied Grain Pty Ltd	Mr Angus Wettenhall	alliedgrain.com.au
Brightcom Australia Pty Ltd	Mr Simon Robertson	03 9591 6300
Cereal Milling Services Pty Ltd	Mr Michael Moss	02 4323 9339
FC Stone Australia Pty Ltd	Mr Brett Cooper	intlfcstone.com
Grain Brokers Australia	Mr Jeff Winspear	grainbrokers.com.au
Grainsplus NSW	Mr David Sykes	grainsplusnsw.com
Horizon Grain Brokers Pty Ltd	Mr Ash Munro	horizongb.com.au
Igrain.com.au Pty Ltd	Mr Tom Roberts	igrain.com.au
McDonald Pelz Australia	Mr Peter Geary	mcdonaldpelz.com
Perkins Commodity Brokers	Mr Craig Perkins	03 9645 6846
Teague Australia Pty Ltd	Mr Tim Teague	teague.com.au
Wimmera Mallee Grain Services	Mr Rodney Edgerton	egrainservices.com.au

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Sole Operator

AgLink - CMS	Mr Justen Schofield	aglinkcms.com.au
Cogeser (Australia) Pty Ltd	Mr Robert Luetolf	cogeser.com.au
Farm Tender	Mr Matt Henke	farmtender.com.au
Knight Commodities	Mr Chris Groat	07 4671 5221
Link Brokering Pty Ltd	Mr Dion Costigan	03 5444 3295
Mallon Commodity Brokering	Mr Ian Mallon	mcbrokering.com
Shearwater International Pty Ltd	Mr Don Cattanaach	07 3324 9088
Woodside Commodities Pty Ltd	Mr Hamish Steele-Park	woodcomm.com.au

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Corporate

Large

ASX Limited	Mr Paul Roberts	asx.com.au/grainfutures
Australia And New Zealand Banking Group	Ms Casey Morecroft	anz.com.au
Commonwealth Bank of Australia	Mr Michael Golden	commbank.com.au

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Medium

Agfarm Pty Ltd	Mr Bob McKay	agfarm.com.au
Agrifood Technology Pty Ltd	Ms Doreen Fernandez	03 9742 0589
Agrisk Management Pty Ltd	Mr Brett Stevenson	02 9499 4199
Clear Grain Exchange	Mr Nathan Cattle	03 9514 9000
Commodity Inspection Services (Australia) Pty Ltd	Mr Mathew Conoulty	commodityinspection.com.au
Foss Pacific Pty Ltd	Mr Simon Kirkman	foss.com.au
Fox Commodities	Mr Paul Cochrane	foxcommodities.com.au
Holding Redlich	Mr Geoff Farnsworth	holdingredlich.com
Holman Fenwick Willan	Mr Stephen Thompson	hfw.com
Intertek	Mr Lee Shilvock	intertek.com
Macpherson + Kelley Lawyers	Mr Tony Gooch	mk.com.au
Merricks Capital Pty Limited	Mr Adam Davis	merrickscapital.com
SBA Law	Mr Jeremy Rosenthal	sbalaw.com
SGS Australia Pty Ltd	Mr James Saunders	au.sgs.com

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Small

Ag Scientia Pty Ltd	Mr Lloyd George	03 9598 1980
Advance Trading Australasia	Mr Andrew Woodhouse	advance-trading.com.au
Agvise Management Consultants	Mr Shane Sander	08 9041 5992
Australian Superintendence Company	Mr Andrew Parry	07 3391 8640

Corporate - Small (cont)

AvantAgri Australia Pty Ltd	Mr Peter Woods	avantagri.com.au
CloudBreak Grain Marketing Pty Ltd	Mr Ed Scamps	08 8388 8084
Delta Agribusiness Pty Ltd	Mr Michael Parry	02 6772 0000
Eyre Peninsula Integrated Commodities Pty Ltd	Ms Tracey Lehmann	08 8627 2304
Farmanco Marketing Pty Ltd	Mr Donald McTaggart	farmanco.com.au
FarMarCo Australia Pty Ltd	Mr Robert Imray	07 4637 6400
Finesse Solutions Pty Limited	Mr Malcolm Finlayson	02 9872 9270
Flexi Grain	Mr Jarrod Tonkin	flexigrain.com.au
Grain Storage Solutions	Mr Kerry Miles	grainstoragesolutions.com.au
Grainx	Mr Chris Hood	grainx.com.au
HarvestCheck Pty Ltd	Mr Stephen Schumacher	0418 199535
Hay Plains Grain Storage Pty Ltd	Mr Ron Harris	0404 444 600
IKON Commodities Pty Ltd	Mr Simon Clancy	ikoncommodities.com.au
Import-Export Services Pty Ltd	Mr Bob Ronai	02 9986 3000
MarketAg Pty Ltd	Mr Mark Martin	02 6747 1590
McMullen Consulting Pty Ltd	Mr Gerard McMullen	03 8300 0108
Mirfak P/L	Mr Mark Murphy	mirfak.com.au
Murray Goulburn Trading Pty Ltd	Mr Gerard Murphy	03 5862 2799
OMIC Melbourne	Mr Koji Nakashima	03 9326 4877
Perten Instruments Australia Pty Ltd	Mr Raul Ovelar	02 9870 3400
Peter McQueen Pty Limited	Mr Peter McQueen	petermcqueen.com
Pinnacle Commodities Pty Ltd	Mr Rod Buckle	pinnaclecommodities.com.au
Planfarm Marketing Pty Ltd	Mr Jerome Critch	planfarm.com.au
Primal Foods Group	Mr Peter Longhurst	02 8011 4182
Rural Directions Pty Ltd	Mr Chris Heinjus	ruraldirections.com
SGA Solutions Pty Ltd	Mr David Hudson	03 5428 4990
Ten Tigers	Mr Chris Tonkin	tentigers.com.au

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International Affiliate

CIS - Commodity Inspection Services	Mr Paul Schweitzer	cis-inspections.com
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Industry Association

Agforce Queensland	Mr Wayne Newton	07 4699 5526
Grain Growers Limited	Mr Michael Southan	graingrowers.com.au
Grain Industry Association of WA	Ms Larissa Taylor	giwa.org.au
Grain Producers Australia Ltd	Mr Andrew Weidemann	grainproducers.com.au
NSW Farmers Association	Mr Justin Crosby	02 8251 1827

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Merchant Association

Grain Industry Association of SA	Mr Tim Mee	08 8395 3572
Grain Industry Association Of Victoria	Mr Colin Peace	giav.com.au
Grain NSW Inc	Mr Steve Fieldus	grainnsw.com.au
Queensland Agricultural Merchants Inc.	Mr John Francis	qam.org.au

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