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Andrew Johnson Assistant Secretary - Maritime and Shipping Branch Department of Infrastructure, Transport, Regional Development and Communication, GPO Box 594 CANBERRA, ACT 2601.

Via Email: coastaltrading@infrastructure.gov.au

20 October 2020

RE: COASTAL TRADING CARGO - SHIPPING REFORM

Dear Andrew,

Grain Trade Australia (GTA) welcomes the opportunity to provide further input to the inquiry into the reform of the coastal trading policy as an effective and efficient supply chain is critical to maintaining and growing productivity and profitability in the agricultural industry and within the grain sector.

Coastal trading is an integral component of the supply chain as demonstrated by the recent movement by bulk vessel of grain from WA and SA into the drought impacted eastern states. **Approximately 6.08 million metric tonnes (mmt) having been transhipped from WA and SA** to east coast ports since May 2018.

1.0 Grain Trade Australia's Role

GTA is the focal point for the commercial grain 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 is non-political, industry driven with a primary focus to ensure the efficient facilitation of commercial activities across the grain supply chain including a strong focus on the logistics of grain through transport, storage, and ports.

GTA has over 280 organisations as members ranging from regional family businesses to large national and international trading, storage and handling companies, grain marketers, consumers, and processors.

The vast majority of grain contracts executed in Australia refer to GTA grain trading standards, standard-form grain contracts and GTA Trade Rules. Most of Australia's grain storage and freight movements are made by GTA members. Key national and state producer representative groups are also GTA Members. A full list of GTA Members is attached to this Submission.

2.0 In-Principle Position:

GTA in its letter to the Hon. Darren Chester MP on 24 April 2017 confirmed support for reducing the regulatory burden on Industry, providing regulatory certainty and simplification for business. This was reconfirmed in a subsequent letter on 31 October 2019. GTA's perspective then, as now, is that reducing the cost, complexity, and burden of un-necessary regulation in coastal shipping will help to facilitate trade, creating improved efficiency, reduced costs and economic value for supply chain participants.

Industry participants including grain traders, logistics providers, ship owners and charterers, and ultimately and importantly grain farmers will all benefit.

2.1 Revised Approach:

GTA consider the Government proposal that cargo and passenger issues are considered separately and giving initial priority to the cargo proposals is meritorious and is supported.

2.2 Discussion Paper – Coastal Trading Reform for Cargo Vessels:

The proposed changes as outlined in the *Coastal Trading Reform for Cargo Vessels* discussion paper are considered appropriate and a good summary of the discussion and direction as discussed in 2019.

GTA considers the implementation of the proposed **Nomination Model** will reduce the regulatory burden on the grain industry and is **supportive of the interstate movement of grain via sea freight** when market and climatic conditi0ons create the demand. As noted in previous correspondence GTA specifically supports the use of ships at end of international voyage to be able to make a coastal voyage as this facilitates better vessel utilisation for the shipping industry and promotes more competitive grain shipping rates for both coastal and export voyages.

Thank you for the opportunity to comment on this discussion paper and to continue to be engaged in this important coastal trading policy reform. Please do not hesitate to contact me should you require further information.

Yours sincerely,

Pat O'Shannassy

CEO, Grain Trade Australia



Membership List as at 15 September 2020

Organisation Contact Website /Phone **Ordinary Member (Trading)** Level A1 (over 7 Million Tonnes) CBH Grain Ptv Ltd Mr Jason Craig cbh com au Glencore Agriculture Pty Ltd glencoreagriculture.com.au Mr Philip Hughes Level A2 (5 - 7 Million Tonnes) Graincorp Operations Ltd Mr Robert Spurway graincorp.com.au Level A3 (3 - 5 Million Tonnes) ADM Trading Australia Pty Ltd Mr Darryl Borlase adm.com Cargill Australia Limited Mr Erik Wibholm cargill.com.au Level A4 (1.5 - 3 Million Tonnes) 0 Level B1 (1.0 - 1.5 Million Tonnes) Emerald Grain Ptv Limited Mr David Johnson emeraldgrain.com Cofco International Ms Sara Pan cofcoagri.com.au Level B2 (500,000 - 1 Million Tonnes) Arrow Commodities Ptv Ltd Mr Dominic Vanzella arrowcom.com.au Australian Grain Export Pty Ltd Mr Brett Dodson australiangrainexport.com.au Barrett Burston Malting Co Ptv Ltd Mr Dean Ganino www.bbmalt.com.au CHS Broadbent Pty Ltd Mr Steve Broadbent broadbentgrain.com.au Mr Jeff Voigt Centre State Exports Ptv Ltd centrestateexports.com.au George Weston Foods Limited Mr Mark O'Brien gwf.com.au Ridley Agriproducts Pty Ltd Mr Michael Reeves agriproducts.com.au Riordan Grain Services Mr Mark Lewis riordangrains.com.au Riverina (Australia) Pty Ltd Mr Gareth Stapleton riverina.com.au bunge.com/agribusiness Bunge Agribusiness Australia Ptv Ltd Mr Stephen Bennett Level B3 (250,000 - 500,000 Tonnes) Allied Pinnacle Pty Ltd Mr Josh Lawrence alliedpinnacle.com Robinson Grain Trading Co Pty Ltd Mr Gary Robinson robinsongrain.com.au Wilmar Gavilon Pty Ltd Mr Matt Albion 07 3713 8700 Louis Dreyfus Company Australia Pty Ltd Mr Sam Roache louisdreyfus.com.au Quadra Commodities Pty Ltd Mr Robin Cassar quadra.com Level C1 (over 10 employees, under 250,000 Tonnes) Adams Australia Pty Ltd Mr Ian Mack adamsaustralia.com.au Agriex Australia Ptv Ltd Mr Joseph Khnessier 02 9232 0690 Agrisk Management Pty Ltd Mr Brett Stevenson 02 9499 4199 AGT Foods Australia Mr Michael Brittain agtfoods.com/australia Associated Grain t/a Agrocorp Processing Australia Mr Bhuvan Gandhi 07 4662 1999 Mr Peter Webb Auscott Ltd auscott.com.au Australian Fresh Milk Holdings (AFMH) Ms Jill Smith 02 6344 8462 Mr Shane Bird BFB Ptv Ltd bfb.com.au Blairs Produce Company Mr Sean Blair 02 6025 4600 Boolah Farms Ptv Ltd Mr Stuart Tighe 02 6754 0343 Castlegate James Australasia Pty Ltd Mr Ross Giovanetti castlegatejames.com.au Coprice Ms Krissy Campbell coprice.com.au Darwalla Milling Co Pty Ltd Mr Gary Heidenreich 07 3822 0527 Deacon Seeds Company Mr Mark Schmidt 07 4662 3217 Mr Chris Deckert Deckert Group Pty Ltd deckerts.com.au Mr Neil Wandel **Esperance Quality Grains** members.westnet.com.au/egg Five Star Stock Feeds Mr Tim Huggins fssf.com.au Fletcher International Exports Pty Ltd Mr Kurt Wilkinson fletchint.com.au Hanlon Enterprises Grain Mr Peter Gerhardy 02 6924 1781 Independent Grain Handlers Pty Ltd Mr Brad Bryant igh.net.au Irwin Stockfeeds Mr Bryan Irwin irwinstockfeeds.com.au Itochu Australia Ltd Mr Justin Swan www.itochu.com.au J K International Ptv Ltd Mr Sandeep Mohan iki.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

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