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5 February 2016

Email: enquiries@apvma.gov.au

Scientific Assessment and Chemical Review Residues and Trade Australian Pesticides and Veterinary Medicines Authority PO Box 6182 Symonston ACT 2609

Dear Sir/Madam

Ref: Trade Advice Notice on Spinetoram in the product Success Neo Insecticide

1. About Grain Trade Australia & Pulse Australia

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 human consumption and stock feed milling. A list of all members is attached.

Pulse Australia is the peak industry body that represents all sectors of the pulse industry in Australia, from growers and agronomists through to researchers, merchants, traders and exporters. Pulse Australia provides coordinated leadership to the Australian pulse industry and facilitates activities that achieve improved profitability for all sectors of the pulse industry. It undertakes a market support role by providing a single voice for industry in the areas of market access and development, negotiating with governments and other industry bodies both domestically and internationally.

Within this context, GTA and Pulse Australia provides comment on the abovementioned Trade Advice Notice (TAN) regarding varying the registration of the product Success Neo Insecticide for use on sorghum, pulses and cotton.

2. Concerns with the proposed variation on use in Sorghum – GTA

Australia is a significant exporter of grain sorghum to many overseas markets. As noted in the TAN "In 2013-14, exports of sorghum totalled 701 kt and were valued at \$253 m. Major export markets for Australian sorghum were China, Japan, Taiwan and New Zealand".

In recent years, average annual sorghum production has been 1.8m tonnes. Since 2011, more than 50% of the sorghum produced in each year has been exported.

Page 7 of the TAN highlights the potential residues arising from the proposed use "the combined spinosad residue data, scaled for the proposed application rate for spinetoram in sorghum, gives the following data set: <0.01 (3), 0.011, 0.015, 0.023, 0.03, 0.049, 0.053, and 0.064 mg/kg. An MRL of 0.2 mg/kg is proposed for spinetoram in sorghum, in conjunction with a 14-day harvest withholding period".

Page 14 of the TAN states "There are potential risks to trade in sorghum, as the major export destinations China, Taiwan and Japan do not appear to have relevant standards established". As outlined in the TAN the proposed use on sorghum will potentially lead to finite levels of spinetoram residues on the harvested sorghum commodity. The residues cited resulting from the trial treatments in the TAN are of concern to the Australian grain industry based on the proposed MRL changes.

The concerns are summarised below for key Australian export markets of sorghum:

China

• China has no MRL for sorghum and therefore a zero tolerance applies.

Codex

• There is no Codex MRL for sorghum. Several minor markets of Australian sorghum default to Codex. If there is no Codex MRL, a default of 0.01ppm or zero may apply, depending on the market. This default level is lower than the proposed Australian MRL.

European Union

• The European Union has an MRL of *0.05mg/kg for sorghum, significantly lower than the proposed Australian MRL.

Japan

- Can be a significant market for Australian sorghum.
- Does not have a specific MRL for spinetoram, however a default level of 0.01mg/kg is thought to apply. This is lower than the proposed Australian MRL.

New Zealand

• Accepts Australian MRLs under the Trans-Tasman Mutual Recognition Agreement. However it is understood a default level of 0.1mg/kg currently applies.

Taiwan

• An MRL of 0.01mg/kg is thought to apply.

Processed Products (e.g., Dried Distillers Grain)

- It does not appear that any residue studies on processed products have been done in the EU.
- While DDG is currently almost exclusively sold for stockfeed, research is occurring to explore value adding pathways such as human consumption and films in food packaging.
- The impacts of residues on DDG (and potential impact on yeast functionality) needs to be determined in order to comment on market acceptability.

Other Current and Potential Markets

- Significant research is being conducted into developing human consumption products for sorghum. This will potentially expand the range of markets (unknown at present) for Australian sorghum.
- A number of African countries take small volumes of Australian sorghum for brewing for human consumption. Several defer to Codex. In addition it is unclear if residues are likely to arise as a result of this human consumption use.
- It is vital that appropriate MRLs are in place in those markets before exports occur.

In general the change in registration status will potentially lead to a greater number of detectable levels of spinetoram on shipments and detection at levels higher than those MRLs in many export markets. This will increase the risk of cargo rejection in markets as listed above.

3. Proposed Use on Pulses – GTA and Pulse Australia

GTA and Pulse Australia support the proposed registration and MRL changes for pulses. For pulses, this support arises for various reasons, including:

- The residues present in the submitted studies were <0.01 mg/kg i.e. below the limit of quantitation, and as such do not pose a trade risk.
- A chemically similar product, spinosad, has been registered and used in pulses (primarily chickpea) in the past with no MRL or trade issues that we are aware of.
- The products used will primarily be in the northern grains region and on chickpea, with a much smaller use on mungbean, adzuki bean and navy bean. All traders currently involved in these markets are well practiced in understanding MRL and trade risks as related to their clients.

- The pulse industry is currently overly reliant on a single product (trade name Altacor) and have experienced significant product shortages in the last two seasons, which increases the risk of producers using products off label.
- The addition of another registered product will be a positive move for the industry in terms of:
 - o Resistance management
 - o Product supply
 - o Providing producers with registered options.

4. Proposed Use on Cotton - GTA

GTA has no concerns with the proposed changes for cotton.

5. Conclusion

The Australian grain industry prides itself on meeting customer and regulatory requirements and implements a range of measures to ensure exports are compliant. Based on the information provided in the TAN, the proposed registration of spinetoram on sorghum presents an unacceptable risk to that trade which at present cannot be mitigated by measures adopted by the Australian grain industry.

Given the potential for residues to arise exceeding several key market MRLs for spinetoram, the Australian grain industry opposes the proposed variation to the registration of spinetoram on sorghum.

The proposed changes for pulses and cotton are supported.

Thank you for your consideration of this response.

Geoff Honey

Chief Executive Officer Grain Trade Australia

On behalf of Pulse Australia



Membership List as at 30 November 2015

Organisation	Contact	Website /Phone
Ordinary Member (Trading)		
Level A1 (over 7 Million Tonnes)		
Co-operative Bulk Handling Limited	Mr Jason Craig	cbh.com.au
Glencore Grain Pty Ltd	Mr Phillip Hughes	glencoregrain.com.au
		2
Level A2 (5 - 7 Million Tonnes)		
Cargill Australia Limited	Ms Penne Kehl	cargill.com.au
		1
Level A3 (3 - 5 Million Tonnes)		
ADM Trading Australia Pty Ltd	Mr Tim Henry	adm.com
Graincorp Operations Ltd	Mr Neil Johns	graincorp.com.au
		2
Level A4 (1.5 - 3 Million Tonnes)		
Emerald Grain Pty Limited	Mr John Warda	emeraldgrain.com
Nidera Australia Pty Ltd	Mr David Lengren	nidera.com.au
		2
Level B1 (1.0 - 1.5 Million Tonnes)		
Bunge Agribusiness Australia Pty Ltd	Mr Chris Aucote	bunge.com/Agribusiness
CHS Trading Company Australia	Mr Bryce Banfield	chsinc.com.au
Louis Dreyfus Australia	Mr Robert Green	louisdreyfus.com.au
Level B2 (500,000 - 1 Million Tonnes)		3
Agrex Australia Pty Ltd	Ms Katrina Liston	agrexaustralia.com.au
George Weston Foods Limited	Mr Mark O'Brien	gwf.com.au
Inghams Enterprises Pty Limited	Mr Graeme Dillon	inghams.com.au
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
		6
Level B3 (250,000 - 500,000 Tonnes)		
Agracom Pty Ltd	Mr Joe Hallman	agracom.com.au
AGRIGRAIN	Mr Jeremy Brown	agrigrain.com
Arrow Commodities Pty Ltd	Mr Dominic Vanzella	arrowcom.com.au
Australian Grain Export Pty Ltd	Mr John Thiele	08 8832 2800
Australian Grain Growers Co-operative Limited	Mr Ian Schofield	aggcoop.com.au
Centre State Exports Pty Ltd	Mr Jeff Voigt	centrestateexports.com.au
Chinatex Australia Pty Ltd	Mr Jiling Lai	02 9957 2688
Lempriere Grain Pty Ltd	Mr Jonathan Holdsworth	lemprieregrain.com.au
Mitsui and Co (Australia) Ltd	Mr Kane Fukuoka	mitsui.com
Riordan Grain Services	Mr Bradley Hogan	riordangrains.com.au
Special One Grain Accumulator	Ms Jaimee Carrigan	specialonegrain.com.au
United World Enterprises Pty Ltd	Mr Jimmy Liu	uwetypical.com
Wilman Carilan Dty I td	No. No. th. Albion	0=0=10.0=00

Mr Matt Albion

07 3713 8700

Wilmar Gavilon Pty Ltd

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

adamsaustralia.com.au **Agmark Commodities** Mr Richard Alcorn agmark.com.au Mr Kishore Bulchandani Agri Om Australia Pty Ltd agriom.com.au Agri-Oz Exports Pty Ltd Mr François Darcas 03 9830 7021 Agriex Australia Pty Ltd Mr Joseph Khnessier 02 9232 0690 Agrifoods Australia Mr Rob Anderson agrifoodsaustralia.com.au

All Commodities Pty Ltd Mr Nathan Holmes allcommodities.com.au
Allied Mills Mr Simon Gelling alliedmills.com.au

AMPS Agribusiness Group Mr David Caldwell 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 Peter Wilson aumg.com.au

Australian Grain Storage Mr Matt Bailey sunrice.com.au

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

BFB Pty Ltd Mr Terry Brabin bfb.com.au
Big River Feeds Pty Ltd Mr Bjorn Ludvigsen 08 8532 4434

Blairs Produce Company

Mr Sean Blair

O2 6025 4600

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Blue Ribbon Seed and Pulse ExportersMr Stephen Donnelly07 3363 8400Boort Grain Co-OperativeMr Tony Bellinger03 5455 2600Broadbent Grain Pty LtdMr Justin Faybroadbentgrain.com.au

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

Castlegate James Australasia Pty Ltd

Mr Dominic Hogan

castlegatejames.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
COPRICE Ms Kirsty Cutter coprice.com.au

Cremer Australia Pty Ltd Mr Brendan Macauley cremer.de

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 CompanyMr Terry Deacon07 4662 3217Deckert Group Pty LtdMr Chris Deckertdeckerts.com.auDefiance Maize Products Pty LtdMr Rodney Walkercorson.co.nz

Demeter Cormack Pty Ltd Mr David Oates 08 6389 0098
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
Feed Central Pty Ltd Mr Tim Ford feedcentral.com.au

Fellows NomineesMr Paul Fellowsfellowsbulk.com.auFertInvest Pty LtdMr Preyesh Bararfertinvest.comFindlays BarellanMr Neil Findlay02 6963 9246

Fletcher International Exports Pty Ltd Mr Kurt Wilkinson fletchint.com.au

Level C (under 250,000 Tonnes) cont.

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

Goodman Fielder Limited Mr Alex Krzanic goodmanfielder.com.au
Grain Direct Australia Mr Lyndon Benecke 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.net.au

GrainTrend Pty Ltd Mr Sanjiv Dubey graintrend.com
Greentree Farming Mr David Brown 02 6751 1228
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

Irwin Stockfeeds Mr Bryan Irwin irwinstockfeeds.com.au Itochu Australia Ltd Mr Justin Swan www.itochu.com.au J K International Pty Ltd Mr Sandeep Mohan jki.com.au

J W Koek & Company Mr Brian Algate 07 3341 4548

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 kennettrural.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

Malteurop Australia Pty Ltd Mr Jack King 03 5277 1950

Matthews Transport and Grain TradersMr Neville Matthews08 9831 1021Max Grains Pty LtdMr Jack Fahymaxgrains.com.au

MC Croker Pty Limited

Mr Greg Carroll

Crokergrain.com.au

Mr Simon Pritchard

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Melaluka Trading Pty Ltd Mr Simon Pritchard melalukatrading.com.au
Mellco Pty Ltd Mr Steve Mellington 0419 867 971

Moulamein Grain Co-Operative Ltd Mr Tony Bellinger moulameingrain.com
Mountain Industries Pty Ltd Mr Keith Morgan mountainindustries.com.au

Moxey Farms Pty LimitedMr Peter Philipzen0407 103 158MSM Milling Pty LtdMr Peter MacSmith02 6364 5999

Murrumbidgee Grains Pty LtdMr Peter Hassall02 6937 9100Namoi Cotton Co-OperativeMr Shane McGregornamoicotton.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 LtdMr Jock Carter02 4962 4006Noble Resources Australia Pty LtdMr Josh Taylorthisisnoble.comNorthern Riverina Grains Pty LtdMr Tony Bellinger03 5032 2553

OOMA Enterprises NSW Pty Limited

Mr Malcolm Berry

oomaenterprises.com.au

Onivir Carrie Pty Ltd.

Mr Pater Prich

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

Level C (under 250,000 Tonnes) cont.

Phoenix Commodities (Australia) Ptv Ltd

Premium Grain Handlers P/L Preston Grain

Peters Commodities Ptv Ltd

Pulse Association of the South East (PASE) Inc

Quadra Commodities Pty Ltd Quirindi Grain & Produce Regal Seed & Grain P/L Reid Stockfeeds Pty Ltd

Rivalea (Australia) Pty Ltd - Animal Nutrition

Riverina Oils & BioEnergy Pty Ltd Robinson Grain Trading Co Pty Ltd

Roty Grain Store

Ruddenklau Grain Ptv Ltd Rural Logic (Aust) Pty Ltd

SANWA Pty Ltd Seedhouse Tasmania Shannon Bros Bulk Haulage Silo Bag Grain (NSW QLD) Pty Ltd

Societa Cofica Ptv Ltd Southern Ark Storage Pty Ltd Southern Cotton Trading Ptv Ltd Southern Cross Agricultural Exports P/L

Southern Grain Storage Pty Ltd

Southern Stockfeeds (Operations) Pty Ltd

Spagricon Australia Ptv Limited

Standard Commodities Australia Pty Ltd

Sumitomo Australia Ptv Ltd Summer Hill Grains

Tasmanian Agricultural Producers Pty Ltd

TSS Grain

Thallon Grains Pty Ltd Twynam Pastoral Company

Unigrain Pty Ltd

Unique Grain Management Pty Ltd

W B Hunter Pty Ltd Ward McKenzie Pty Ltd Whitty Produce Whyalla Beef Pty Ltd

Wimpak Export Company Pty Ltd

XLD Grain Pty Ltd

Wilken Grain

Mr Michael Oxlev Mr Jogesh Virk Mr John Orr Mr Andrew Kell

Ms Leanne Burr Mr Andrew Jackson Mr John Webster Mr Damien White

Mr Ian Reid Mr Andrew Philpotts

Mr Lachlan Herbert Mr Gary Robinson Mr Brian Newman Mr Tim Ruddenklau Mr Michael Wood

Mr Charles Emerson Mr Matthew Crane Mr Clayton Shannon Ms Lesley Kilby

Mr Dia Ram Sharma Mr Simon Pritchard Mr Chris Veness Mr Matthew Barnes

Mr Campbell Brumby Mr Brendan Maher Mr Jiger Kotecha Mr Michael Betar

Mr Tsuyoshi Osumi Mr Barney Hughes Mr David Skipper Mr Trevor Macleod

Mr Andrew Earle Ms Leslev Heidtman Mr Ervin Leong Mr Mark Thiele Mr Stewart Coombes

Mr Mal Parkhill Ms Marsha McMonigle Mr Gino De Stefani Mr Richard Wilken Ms Jo Cameron

Mr Lachie Stevens

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seedhouse.com.au 03 5390 2264 02 6847 1788 societacofica.com.au arkstorage.com.au

> 02 69 552 779 0427 876 643 03 5267 2351 03 5437 8295

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tasagproducers.com.au tasstockfeed.com.au 02 6756 5004 twvnam.com

uniquegrain.com.au 03 5821 5744 mckenziesfoods.com.au

unigrain.com.au

03 5721 6588 whvallabeef.com.au wilkens.com.au wimpak.com.au

xldgrain.com.au

154

Transport Operator

Gehrke Grains and Transport Pty Ltd Wakefield Grain Export Services

Mr Julian Gehrke Mr John Gray

07 5465 6695 wakefields.com.au

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Broker

Large 0

Medium

Allied Grain Pty Ltd Mr Angus Wettenhall alliedgrain.com.au Mr Simon Robertson Brightcom Australia Pty Ltd 03 9591 6300 Cereal Milling Services Ptv Ltd Mr Michael Moss 02 4323 9339 Fox Commodities Mr Paul Cochrane foxcommodities.com.au Grain Brokers Australia Mr Jeff Winspear grainbrokers.com.au Horizon Grain Brokers Ptv Ltd Mr Ash Munro horizongb.com.au Igrain.com.au Pty Ltd Mr Tom Roberts igrain.com.au Intl FC Stone Pty Ltd Mr Brett Cooper intlfcstone.com 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

Sole Operator

AgLink - CMS Mr Justen Schofield aglinkcms.com.au Mr Robert Luetolf Cogeser (Australia) Pty Ltd cogeser.com.au Farm Tender Mr Matt Henke farmtender.com.au Mr Chris Groat **Knight Commodities** 07 4671 5221 Mallon Commodity Brokering Mr Ian Mallon mcbrokering.com Quest Commodities Pty Ltd Ms Javne Barker questcommodities.com.au Shearwater International Pty Ltd Mr Don Cattanach 07 3324 9088 Mr Rodney Edgerton egrainservices.com.au Wimmera Mallee Grain Services Woodside Commodities Pty Ltd Mr Hamish Steele-Park woodcomm.com.au

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Corporate

Large

ASX Limited Mr Kristen Hopkins asx.com.au/grainfutures
Australia And New Zealand Banking Group Mr Ian Hanrahan anz.com.au
Commonwealth Bank of Australia Mr Tom Barraket commbank.com.au
Symbio Laboratories Ms Elizabeth Owens symbiolabs.com.au

Medium

Agfarm Pty Ltd Mr Ron McCalman agfarm.com.au Agrifood Technology Pty Ltd Ms Doreen Fernandez 03 9742 0589 Agrisk Management Pty Ltd Mr Brett Stevenson 02 9499 4199 Australian Superintendence Company Mr Andrew Parry 07 3391 8640 Commodity Inspection Services (Australia) Pty Ltd Mr Mathew Conoulty commodityinspection.com.au Mr Simon Kirkman Foss Pacific Pty Ltd foss.com.au Holding Redlich Mr Geoff Farnsworth holdingredlich.com Mr Stephen Thompson Holman Fenwick Willan hfw.com Intertek Mr Lee Shilvock intertek.com Merricks Capital Pty Limited Mr Adam Davis merrickscapital.com NZX Australia (CGX, ACF, PFA) Mr Nathan Cattle nzx.com SBA Law Mr Jeremy Rosenthal sbalaw.com SGS Australia Pty Ltd Mr Scot Paterson au.sgs.com 13

Small

Advance Trading Australasia Mr Andrew Woodhouse advance-trading.com.au Ag Scientia Pty Ltd Mr Lloyd George 03 9598 1980 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 Direct Commodities Pty Ltd Mr Hamish Robertson directcommodities.com.au **EP Integrated Commodities Pty Ltd** Ms Tracey Lehmann 08 8627 2304 Corporate - Small (cont)

Farmanco Marketing Ptv Ltd FarMarCo Australia Pty Ltd Finesse Solutions Pty Limited

Flexi Grain

Goldstar Commodities Grain Storage Solutions

Grainx

HarvestCheck Pty Ltd

Hay Plains Grain Storage Pty Ltd **IKON Commodities Pty Ltd**

JBS Australia MarketAg Pty Ltd

McMullen Consulting Pty Ltd

Mirfak P/L

Murray Goulburn Trading Pty Ltd

OMIC Australia Ptv Ltd

Perten Instruments Australia Pty Ltd

Peter McQueen Ptv Limited Pinnacle Commodities Pty Ltd Planfarm Marketing Pty Ltd Primal Foods Group Rural Directions Pty Ltd SGA Solutions Pty Ltd

TE Storage & Logistics Pty Ltd

Ten Tigers

International Affiliate

CIS - Commodity Inspection Services

Industry Association

Grain Growers Limited Grain Industry Association of WA Grain Producers Australia Ltd **NSW Farmers Association**

Victorian Farmers Federation

Merchant Association

Grain Industry Association of SA Grain Industry Association Of Victoria

Grain NSW Inc

Queensland Agricultural Merchants Inc.

Mr Donald McTaggart Mr Robert Imrav

Mr Malcolm Finlayson Mr Jarrod Tonkin Mr Geoff Webb

Mr Kerry Miles Mr Chris Hood

Mr Stephen Schumacher Mr Ron Harris

Mr Simon Clancy Mr Richard Nicholls Mr Mark Martin

Mr Gerard McMullen Mr Mark Murphy

Mr Gerard Murphy Mr Yasuhide Okumura Mr Raul Ovelar

Mr Peter McQueen Mr Rod Buckle Mr Jerome Critch

Mr Peter Longhurst Mr Chris Heinjus Mr David Hudson

Mr Tom Hage Mr Chris Tonkin

Mr Paul Schweitzer

Ms Alicia Garden Ms Larissa Taylor Mr Andrew Weidemann

Mr Justin Crosby Mr Stephen Sheridan

Mr Tim Mee

Mr Colin Peace Ms Joanne Ware Mr John Francis

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ibssa.com.au 02 6747 1590 03 8300 0108

mirfak.com.au 03 5862 2799 omicaustralia.com.au

02 9870 3400 petermcqueen.com pinnaclecommodities.com.au

> planfarm.com.au 02 8011 4182 ruraldirections.com

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giwa.org.au grainproducers.com.au

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08 8395 3572

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giav.com.au

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