

27 September 2019

GM Secretariat Support
Primary Industries and Regions SA - PIRSA
Government of South Australia | GPO Box 1671 Adelaide SA 5001

Email: PIRSA.GMReview@sa.gov.au

Re: Submission to South Australia Statutory Consultation on variation to the *Genetically Modified Crops Management Act 2004*

Grain Trade Australia (GTA) welcomes the recent announcement to lift the GM moratorium on mainland South Australia. GTA supports market and farmer choice in relation to access to GM crops approved by the Gene Technology Regulator.

The recent independent review undertaken by the South Australian Government identified that the impact of the current legislation has had a net cost on the state's canola industry, with no tangible trade or marketing benefits. Further, there is no evidence of any adverse impact on other sectors in those States that grow GM crops.

The Australian grains industry's profitability, competitiveness and sustainability has been based on continual innovation and adoption of new technologies. GM crops are one such technology that have significant potential to create productivity and market opportunity and growth. GTA is actively involved in industry discussions on this issue globally via its membership of the International Grain Trade Coalition (IGTC) and domestically via the GTA technical committee on Plant Breeding Innovation that brings together representatives from across the Australian grain and seed value chain.

GTA works with the grains industry to ensure that it has access to and implements systems and processes to maintain choice and ensure that customer requirements in domestic and export markets can be met.

Lifting the GM moratorium in mainland South Australia increase choice to farmers and markets while the industry has the systems in place to enable this choice to be delivered.

About GTA

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.

Thus, this submission is made within this context and focuses on the issues from a facilitation of trade perspective.

Managing commercialisation of GM crops

GTA supports research utilising innovative plant breeding technologies to enhance the productive capacity of Australian grain producers. GTA supports the commercial release and trade of Genetically Modified (GM) grain crops where these have been approved for commercial release by the Office of Gene Technology Regulator (OGTR) and other relevant Federal, State and Territory regulators.

The Australian grains industry has adopted a market choice approach in relation to GM crops. Market choice refers to the freedom of choice for all parties in the value chain (i.e. producers, marketers and consumers) in relation to what to grow, handle and process, and choice in end products. The industry's market choice framework - *"Delivering Market Choice with GM Crops"* - brings together the industry's practices and protocols that industry requires to be satisfied are in place to enable the seamless development, commercial release and trade of GM grain. This framework is endorsed by:

- Australian Oilseeds Federation
- Australian Seed Federation
- Grain Producers Australia
- GrainGrowers
- Grain Trade Australia
- Pulse Australia

Refer Attachment I

GTA supports the current regulatory framework which deals with human health and environment safety and Australia's globally recognised, science based regulator – Office of Gene Technology Regulator. Regulations should be based on evidence and sound science. Lifting the GM moratorium in mainland South Australia is consistent with this approach. The Anderson report estimated that the GM moratorium has had a cumulative cost of \$33 million for the state's canola industry over 2004-2018, with no tangible trade or marketing benefits¹. It would also be expected that the moratorium has had adverse impacts on investment in research and innovation within South Australia.

The Australian grains industry has long demonstrated its ability to manage a range of quality issues through the supply chain to meet market requirements. Management of GM crops is no different.

GTA members are involved in growing, handling and marketing GM crops approved for commercial release. The industry has supported a position of market choice and has in place processes and tools across the grain industry supply chain to ensure that choice is enabled for producers, grain handlers and marketers and consumers.

The grains industry has a demonstrated track record in delivering market choice with GM canola. The systems to deliver this are based on proven systems and processes that the industry utilises to meet a range of quality and customer requirements. Thresholds are a common feature of standards in grains and these thresholds are essential in preventing unnecessary disruptions to trade. The existence of practical thresholds for GM and other production systems is vital in allowing different production systems to coexist.

Self-regulation is a key focus of the Australian grains industry and the industry has a mature, proven and recognised framework for self-regulation (refer Figure 1). The Australian grains industry is a world leader in having an industry managed framework for facilitating trade and is the only export nation with a Grain Industry Code of Practice. Adherence to the Code is a mandatory requirement for membership to GTA.

Australian grain is recognised globally for its safety and quality. This is based on the industry's sustainable production processes and self-regulation framework, with features being produced with innovative technology in clean, safe environment; high product quality and safety; quality assurance systems across its supply chain to deliver quality and safety; and an Industry wide Code of Practice.

¹ Anderson, K (2019) 'Independent Review of the South Australian GM Food Crop Moratorium', Report to the SA Minister for Primary Industries and Regional development, February.

Industry driven & managed framework to facilitate trade



Figure 1: Grain industry framework to facilitate trade

The importance of stewardship is built into processes across the supply chain and GTA actively supports the industry through a range of codes of practice/guidelines and a professional development program to build skills and capability. In relation to GM crops, GTA has developed two key documents namely, Delivering Market Choice with GM Crops and Industry Response Plan (GM Crops).

Implementation of market choice for GM crops is delivered through on-farm stewardship programs, commercial practices, processes and protocols that address marketing and technical requirements, import and export requirements, and supply chain mechanisms. Industry stakeholders along the value chain undertake a wide array of measures – known as “process controls” – to manage for market choice.

The objectives of the Market Choice Framework are to:

- minimise disruptions to the supply chain and trade while protecting the health and safety of humans and the environment
- facilitate an effective and efficient risk-based approach to managing supply chain and trade risks while meeting customer requirements
- provide transparency and predictability for supply chain participants, most notably importers and exporters

The industry has demonstrated the ability to successfully manage GM and non-GM crops in a manner that delivers market choice and maintains Australia’s reputation as a supplier of quality, safe grain which is fit for purpose and meets customer requirements. There is no ‘trade’ basis to restrict farmer, supply chain or consumer choice to grow/handle/market crops that have been approved for commercial release by the Federal regulator.

GTA supports the lifting of the GM moratorium in mainland South Australia. The grain industry has the framework and specific tools and processes in place to successfully manage GM crops across the value chain in South Australia.

Regards



Pat O'Shannassy
CEO

Attachments:

- *Delivering Market Choice with GM Crops 2018*
- List of GTA Members

Membership List as at 25 September 2019

Organisation	Contact	Website /Phone
Ordinary Member (Trading)		
Level A1 (over 7 Million Tonnes)		
CBH Grain Pty Ltd	Mr Jason Craig	cbh.com.au
Glencore Agriculture Pty Ltd	Mr Philip Hughes	glencoreagriculture.com.au
		2
Level A2 (5 - 7 Million Tonnes)		
Graincorp Operations Ltd	Mr Klaus Pamminger	graincorp.com.au
		1
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
		2
Level A4 (1.5 - 3 Million Tonnes)		
		0
Level B1 (1.0 - 1.5 Million Tonnes)		
Arrow Commodities Pty Ltd	Mr Dominic Vanzella	arrowcom.com.au
Plum Grove Pty Ltd	Mr Andrew Young	plumgrove.com.au
Emerald Grain Pty Limited	Mr David Johnson	emeraldgrain.com
Cofco International	Ms Sara Pan	cofcoagri.com.au
		4
Level B2 (500,000 - 1 Million Tonnes)		
Australian Grain Export Pty Ltd	Mr Brett Dodson	australiangrainexport.com.au
CHS Broadbent Pty Ltd	Mr Steve Broadbent	broadbentgrain.com.au
Centre State Exports Pty Ltd	Mr Jeff Voigt	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 Kenji Kumoi	riverina.com.au
Bunge Agribusiness Australia Pty Ltd	Mr Stephen Bennett	bunge.com/agribusiness
		8
Level B3 (250,000 - 500,000 Tonnes)		
Agfarm Pty Ltd	Mr Ron McCalman	agfarm.com.au
Agracom Pty Ltd	Mr Joe Hallman	agracom.com.au
Agrisk Management Pty Ltd	Mr Brett Stevenson	02 9499 4199
Allied Pinnacle Pty Ltd	Mr Josh Lawrence	alliedpinnacle.com
Robinson Grain Trading Co Pty Ltd	Mr Gary Robinson	robinsongrain.com.au
Wilmar Gaviion 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
		8

Ordinary Member (Trading)

Level C (under 250,000 Tonnes)

A T Waterfield & Son Pty Ltd	Mr Brad Waterfield	03 5382 3725
A W Vater and Co	Mr Kim Vater	vater.com.au
Access Grain Pty Ltd	Mr Wade Humphreys	accessgrain.com.au
Adams Australia Pty Ltd	Mr Ian Mack	adamsaustralia.com.au
Agmark Commodities	Mr Richard Alcorn	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
Agromin Australia Pty Limited	Mr Rajni Patel	agromin.com.au
AGT Foods Australia	Michael Brittain	agtfoods.com/australia
Associated Grain	Mr Bhuvan Gandhi	07 4662 1999
Auscott Ltd	Mr Peter Webb	auscott.com.au
AusiCan Commodities	Mr Douglas Saunders	ausican.com
Australian - Asian Agricultural Exports Pty Ltd	Mr Mick Connolly	aaax.ws
Australian Choice Exports Pty Ltd	Mr James Hunt	australianchoiceexports.com.au
Australian Grain Storage	Mr Matt Bailey	sunrice.com.au
Australian Growers Direct Pty Ltd	Mr Tom Lucas	ausgrowersdirect.com.au
Australian Mungbean Company Pty Ltd	Mr Damien White	australianmungbean.com.au
Australian Storage Alliance Pty Ltd	Mr Jon Bucknall	0447 652 716
Baker Grain	Mr Richard Baker	bakergrain.com.au
BFB Pty Ltd	Mr Terry Brabin	bfb.com.au
Blairs Produce Company	Mr Sean Blair	02 6025 4600
Boolah Grains Pty Ltd	Mr Stuart Tighe	02 6754 0343
Boort Grain Co-Operative	Mr Jon Bucknall	02 9875 3919
Broun and Co Grain Pty Ltd	Mr Wal Broun	brounandco.com.au
C & S Trading Pty Ltd	Mr Craig Scholz	scholzbh.com.au
C K Tremlett Pty Ltd	Mr Andrew Tremlett	08 8524 9050
Carpendale Commodities	Mr Andrew Kluck	0448 761 246
Cameron Pastoral Company Pty Ltd	Mr Ken Cameron	07 4671 4144
Castlegate James Australasia Pty Ltd	Mr Ross Giovanetti	castlegatejames.com.au
CL Commodities Pty Ltd	Mr Robert Lean	clcommodities.com.au
Coorow Seeds	Mr Brian Pover	coorowseeds.com.au
Coprice	Mr Lyndon Benecke	coprice.com.au
Cremer Australia Pty Ltd	Mr Scott Haughton	cremer.com.au
DA Hall and Co	Mr Bruce Holden	07 4695 5777
Dalby Bio-Refining Limited		dbrl.com.au
Darwalla Milling Co Pty Ltd	Mr Gary Heidenreich	07 3822 0527
Deacon Seeds Company	Mr Mark Schmidt	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
Donnellons Bulk Haulage Pty Ltd	Mr Bill Donnellon	0428 136 483
East Coast Stockfeed Pty Ltd		ecsf.com.au
Elders Grain	Mr Lachlan Allen	elders.com.au
Esperance Quality Grains	Mr Neil Wandel	members.westnet.com.au/eqg
Export Trading Group Australia Pty Ltd	Mr Shayne Clark	etgworld.com
Feed Central Pty Ltd	Mr Tim Ford	feedcentral.com.au

Level C (under 250,000 Tonnes) cont.

Findlays Barellan	Mr Neil Findlay	02 6963 9246
Five Star Stock Feeds	Mr Tim Huggins	fssf.com.au
Fletcher International Exports Pty Ltd	Mr Kurt Wilkinson	fletchint.com.au
GO Resources Pty Ltd	Ms Rosemary Richards	go-resources.com.au
Golden Harvest Grain Exports	Mr Chandru Hiremath	goldenharvest.net.au
Gold Star International Pty Ltd	Abhishek Kotkar	goldstarinternational.com.au
Grain Direct Australia	Mr Chris Kochanski	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
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
Harwood Grains Pty Ltd	Ms Rebecca Molloy	harwoodgrains.com.au
Harberger's Farm Supplies (Trading) Pty Ltd	Mr Reece Harberger	harberger.com.au
Hassad Australia Operations Company Pty Ltd	Ms Terrie Morgan	02 9900 3700
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 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
KB Agri Services Pty Ltd	Mr Karl Bliss	07 4634 4320
K M & W M Kelly & Sons	Mr Matt Kelly	kellygrains.com.au
Kangaroo Island Pure Grain Pty Ltd	Ms Emma Tonkin	kipuregrain.com
Kennett Rural Services Pty Ltd	Mr Andrew Kennett	kennetrural.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
Laragon Almond Processors Pty Ltd	Mr Mark Webber	laragon.com.au
Laucke Flour Mills P/L	Mr Roger Laubsch	laucke.com.au
Lawson Grains Pty Ltd	Mr Angus Blair	lawsongrains.com
LDC Enterprises Australia Pty Ltd	Mr Richard Porter	07 3253 5999
LINX Cargo Care	Mr David Simpson	linxcc.com.au
LPC Trading Pty Ltd	Mr Simon Langfield	02 6383 7222
Mandala Trading Pty Ltd	Mr Jayjeev Saraff	mandalatrading.com.au
Malteurop Australia Pty Ltd	Mr Jack King	03 5277 1950
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
Moulamein Grain Co-Operative Ltd	Mr Tony Bellinger	moulameingrain.com
Moxey Farms Pty Limited	Ms Jill Smith	02 6344 8462
MSM Milling Pty Ltd	Mr Peter MacSmith	02 6364 5999
Namoi Cotton Ltd	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

Level C (under 250,000 Tonnes) cont.

Origin Grain Pty Ltd	Mr Peter Brick	03 5720 8500
Pacific Global Sprouts Pty Ltd	Mr Prashant Kewlani	pacificglobalsprouts.com
Parkinson Bros	Mr Rohan Parkinson	parkinsonbros.com.au
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
Peters Commodities Pty Ltd	Mr Michael Oxley	petcom.com.au
Phoenix Global Australia Pty Ltd	Mr Jogesh Virk	phoenixcommodities.com.au
Premium Grain Handlers P/L	Mr John Orr	pgh.com.au
Preston Grain	Mr Andrew Kell	02 6977 1733
Pulse Association of the South East (PASE) Inc	Ms Leanne Burr	08 9071 3655
Quattro Ports	Mr Dene Ladmore	quattroports.com.au
Quirindi Grain & Produce	Mr John Webster	02 6746 1911
Reid Stockfeeds Pty Ltd	Mr Ian Reid	reidstockfeeds.com.au
Rhodium Trading Australia Pty Ltd	Mr Mark Fitzgerald	rhodiumresources.com
Rivalea (Australia) Pty Ltd - Animal Nutrition	Mr Andrew Philpotts	rivalea.com.au
Riverina Oils & BioEnergy Pty Ltd	Mr Lachlan Herbert	riverinaoils.com
RT Wallace Pty Ltd	Mr Reilly Wallace	wallacebulkhaulage.com.au
Ruddenklau Grain Pty Ltd	Mr Tim Ruddenklau	08 8842 1314
Rural Logic (Aust) Pty Ltd	Mr Michael Wood	rurallogic.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 Syd Parsons	southerncrossag.com.au
Southern Grain Storage Pty Ltd	Mr Campbell Brumby	03 5267 2351
Southern Stockfeeds (Operations) Pty Ltd	Mr David Jemmet	03 5437 8295
Spagrimon Australia Pty Limited	Mr Jiger Kotecha	spagrimon.com.au
Standard Commodities Australia Pty Ltd	Ms Elizabeth Bozinowska	stancom.com.au
Sudima Australia Pty Ltd	Mr Jim Garvey	sudima.com
Summer Hill Grains	Mr Barney Hughes	0428 694 363
SunPork Farms Feed Mills	Mr Mark Young	08 8532 4434
Swiss Singapore (Australia) Pty Ltd	Surya Jain	swiss-singapore.com
Tasmanian Agricultural Producers Pty Ltd	Mr David Skipper	tasagproducers.com.au
Thallon Grains Pty Ltd	Mr Andrew Earle	02 6756 5004
ThriveAgri	Mr Charlie Brown	thriveagri.com
TSS Grain	Mr Trevor Macleod	tasstockfeed.com.au
Twynam Pastoral Company	Ms Lesley Heidtman	twynam.com
Ulusoy Asia Pacific	Mr Mark Madjarevic	ulusoyflour.com
Unigrain Pty Ltd	Mr Ervin Leong	unigrain.com.au
Unique Grain Management Pty Ltd	Mr Mark Thiele	uniquegrain.com.au
Universal Commodity Management	Mr Tim Dean	commoditymanagement.com.au
W B Hunter Pty Ltd	Mr Stewart Coombes	03 5821 5744
Ward McKenzie Pty Ltd	Mr Geoff Hammon	mckenziefoods.com.au
Watershed Commodities	Mr Jack Vivers	0427 715 543
Watson's Bulk Logistics	Mr Joel Watson	wbl.net.au
WHG Oceania Pty Ltd	Gesheng Shen	02 8040 3030
Wilken Grain	Mr Richard Wilken	wilkens.com.au
Wimpak Pty Ltd	Mr James French	wimpak.com.au

Woods Grain Pty Ltd	Mr Bruce Woods	woodsgrain.com.au
WW Agri Pty Ltd	Mr Steve Sloss	wwagri.com.au
XLD Grain Pty Ltd	Mr Lachie Stevens	xldgrain.com.au
Yenda Prods Grain Pty Ltd	Mr Luke Mancini	0437 512 322

156

Transport Operator

Aurizon Operations Limited	Ms Ruth Stjernqvist	aurizon.com.au
Gehrke Grains and Transport Pty Ltd	Mr Julian Gehrke	07 5465 6695
Hamilton Contracting (NSW) Pty Ltd	Ms Jodie Hamilton	hamiltoncontracting.com.au
Pacific National (NSW) Pty Ltd	Mr Antony Borgese	pacificnational.com.au
SEAWAY Intermodal Pty Ltd	Mr Bikash Ram	seawayintermodal.com.au

5

Broker

Large		0
-------	--	---

Medium

Grain Brokers Australia	Mr Jeff Winspear	grainbrokers.com.au
Horizon Grain Brokers Pty Ltd	Mr Ash Munro	horizongb.com.au
INTL FCStone 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

6

Sole Operator

A C Grain	Mr Adam Clarke	0400 065 763
ACCB Australia	Mr Andy Cunliffe	0455 105 300
Allied Grain Pty Ltd	Mr Angus Wettenhall	alliedgrain.com.au
Cogeser (Australia) Pty Ltd	Mr Robert Luetolf	cogeser.com.au
Esquire Commodities Pty Limited	Mr Rowan Relton	07 4635 7215
Farm Tender	Mr Matt Henke	farmtender.com.au
Lotema Pty Ltd	Mr Todd Lees	lotema.com.au
Mallon Commodity Brokering	Mr Ian Mallon	
Quest Commodities Pty Ltd	Ms Jayne Barker	questcommodities.com.au
Wimmera Mallee Grain Services	Mr Rodney Edgerton	egrainservices.com.au
Woodside Commodities Pty Ltd	Mr Hamish Steele-Park	woodcomm.com.au

11

Corporate

Large

ASX Limited	Mr Ian Waddell	asx.com.au/grainfutures
Australia And New Zealand Banking Group	Mr Ian Hanrahan	anz.com.au
Australian Grain Technologies Pty Ltd	Mr Tristan Coram	agtbreeding.com.au
Commonwealth Bank of Australia	Mr Tom Barraket	commbank.com.au

4

Medium

AgriDigital	Mr Henry McKay	agridigital.io
Agrifood Technology Pty Ltd	Ms Doreen Fernandez	03 9742 0589
Amspec Australia Pty Ltd	Mr Lee Shilvock	amspecgroup.com
Australian Superintendence Company	Mr Andrew Parry	07 3391 8640
Commodity Inspection Services (Australia) Pty Ltd	Mr Mathew Conoulty	commodityinspection.com.au
Foss Pacific Pty Ltd	Mr Simon Kirkman	foss.com.au
Holding Redlich	Mr Geoff Farnsworth	holdingredlich.com
Holman Fenwick Willan	Mr Stephen Thompson	hfw.com
Intertek	Mr Ben Jones	intertek.com
SBA Law	Mr Jeremy Rosenthal	sbalaw.com
SGS Australia Pty Ltd	Mr Scot Paterson	au.sgs.com
T-Ports Pty Ltd	Mr Kieran Carvill	tports.com

Corporate (cont.)**Small**

Advance Trading Australasia	Mr Andrew Woodhouse	advance-trading.com.au
Ag Scientia Pty Ltd	Mr Lloyd George	03 9598 1980
Basis Commodities Pty Ltd	Mr Chris Whitwell	basiscommodities.com.au
Clear Grain Exchange	Mr Nathan Cattle	cleargrain.com.au
CloudBreak Grain Marketing Pty Ltd	Mr Ed Scamps	08 8388 8084
Delta Agribusiness Pty Ltd	Mr Michael Parry	02 6772 0000
EP 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
Goldstar Commodities	Mr Geoff Webb	goldstarcommodities.com.au
Graintec Scientific Pty Ltd	Mr Lucas Anstiss	graintec.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
Indigo Agriculture Australia Pty Ltd	Mr Peter McMeekin	indigoag.com.au
IKON Commodities Pty Ltd	Mr Ole Houe	ikoncommodities.com.au
Lachstock Consulting	Mr Lachie Stevens	xldgrain.com.au
MarketAg Pty Ltd	Mr Mark Martin	02 6747 1590
McMullen Consulting Pty Ltd	Mr Gerard McMullen	03 8300 0108
Mercari Pty Ltd	Mr Scott Still	mercari.com.au
Merricks Capital Pty Limited	Mr Adam Davis	merrickscapital.com
Mirfak P/L	Mr Mark Murphy	mirfak.com.au
National Grower Register Pty Ltd	Ms Debbie Newmarch	ngr.com.au
OMIC Australia Pty Ltd	Mr Yasuhide Okumura	omicaustralia.com.au
Perten Instruments Australia Pty Ltd	Mr Raul Ovelar	02 9870 3400
Pinnacle Commodities Pty Ltd	Mr Rod Buckle	pinnaclecommodities.com.au
Planfarm Marketing Pty Ltd	Mr Jerome Critch	planfarm.com.au
Plansafe Logistics Pty Ltd	Mr Mark Sloan	plansafelogistics.com.au
Primal Foods Group	Mr Peter Longhurst	primalfoodsgroup.com
Profarmer Australia Pty Ltd	Ms Hannah Janson	australiancropforecasters.com.au
Rise Agribusiness Pty Ltd	Mr Ian Dalglish	riseagri.com.au
Rural Directions Pty Ltd	Mr Chris Heinjus	ruraldirections.com
Saputo Dairy Australia Pty Ltd	Mr Robert Ford	1300 643 333
SGA Solutions Pty Ltd	Mr David Hudson	03 5428 4990
TE Storage & Logistics Pty Ltd	Mr Tom Hage	08 8762 2188
Ten Tigers	Mr Chris Tonkin	tentigers.com.au
Wattletree Consulting Pty Ltd	Jon Bucknall	

International Affiliate

CCIC Australia Pty Ltd	Mr Isherwood Feng	02 9580 3212
CIS - Commodity Inspection Services	Mr Paul Schweitzer	cis-inspections.com

Industry Association

Australia Export Grain Innovation Centre	Mr Richard Simonaitis	aegic.org.au
Grain Growers Limited	D. McKeon	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	Ms Alexandra Bunton	02 9478 1000
Victorian Farmers Federation	Ms Annabel Mactier	03 9207 5555
		6

Merchant Association

Grain Industry Association of SA	Mr Ben Noll	+61 8 8361 5601
Grain Industry Association Of Victoria	Mr Colin Peace	giav.com.au
Grain NSW Inc	Ms Joanne Ware	grainnsw.com.au
Queensland Agricultural Merchants Inc.	Mr John Francis	qam.org.au
		4

Life Members

Mr Mervyn May	Awarded 1998
Mr Christopher Kelly	Awarded July 2015
Mr Geoff Honey	Awarded July 2016
Mr Terry Deacon	Awarded August 2019
	4



Delivering market choice with GM crops

*An industry framework developed on behalf of the
Australian Grain Industry by the Grain Trade Australia
Plant Breeding Innovation Committee*
April 2019



Executive Summary

The Australian grains industry has the capacity to deliver and manage the commercial introduction of crops derived from biotechnology.

The Market Choice Framework is targeted at ensuring the commercial introduction of GM¹ crops is undertaken in a manner that:

- Maintains or enhances trade in the Australian grains industry
- Enables market choice along the supply chain, while being consistent with bulk handling systems and manufacturing practices
- Is open and transparent
- Provides confidence to all stakeholders, particularly to customers, consumers and governments in relation to the certainty and viability of supply to participants along the supply chain

The capacity and capability required for implementation will be provided by industry stewardship programs, commercial practices, processes and protocols that address marketing and technical requirements, import and export requirements and supply chain mechanisms.

These measures will provide the necessary certainty and confidence to supply chain participants, consumers and governments that GM crops and their products will be managed to meet market and customer requirements. Importantly, these measures will provide market choice.

The Market Choice Framework supports the implementation of coexistence, that is, the concurrent production of conventional, organic, IP (identity preserved) and GM crops consistent with supply chain preferences. The Australian grains industry has adopted a “Market Choice” approach to enable choice for consumers, producers and the supply chain.

The Market Choice Framework is about ensuring that GM crops approved by the Gene Technology Regulator in Australia, are commercialised in a manner that allows market requirements to be met for commodity comingled (i.e. GM + Non-GM) markets and specialised non GM markets.

The Market Choice Framework has been compiled by Grain Trade Australia (GTA) for the Australian grains industry and major stakeholders have endorsed this document as an appropriate strategy to deliver market choice.

The Market Choice Framework is to be applied to any GM crop that has been approved for commercial release by the Office Gene Technology Regulator (OGTR) and the specific requirements agreed by supply chain stakeholders on a case by case basis.



¹ GM crops include those crops regulated by the OGTR

Introduction

There is broad recognition within the Australian grains industry that gene technology and new breeding technologies have the potential to play a major role in meeting the demands of food, feed and industrial consumers and that the industry requires competitive access to this technology in which it has made a significant investment.

The environmental, agronomic, economic and social benefits provided by GM crops, are contributing to the resolution of the rapidly increasing international demand for food, feed, fuel and fibre. GM crops continue to be incorporated into a range of farming systems and supply chains delivering food, feed and fibre to consumers around the world.

A record 189.8 million hectares of biotech crops were grown globally in 2017, up 4.7 million hectares from 2016. The global area of biotech crops has increased more than 112-fold from 1.7 million hectares in 1996 to 189.8 million hectares in 2017 making biotech crops the fastest adopted crop technology in recent times.

In 2017 24 countries planted biotech crops and an additional 43 countries imported biotech crops. Soybean, Corn, cotton and canola comprise the top four GM commodities globally. In 2017, 72% of global soybean production was GM soybeans, corn (32%), cotton (80%) and canola (30%).

Over 90 per cent of both the Australian cotton crop and around 20 per cent of the Australian canola crop is now planted to GM varieties.

Following the approval of GM canola for commercial release in Australia in 2003, the Australian grains supply chain examined and identified supply chain management processes to manage GM canola and developed “Delivering Market Choice with GM Canola”.

This Framework forms a strong foundation for review of processes to manage the commercial release of future GM crops that will generate products that will be utilised domestically and in export markets.

The capacity to deliver market choice is built on the comprehensive and world-class protocols and processes that already operate in the Australian grains industry to enable grains and grain products to meet regulatory and customer specifications. These protocols and processes provide the necessary product integrity that provides confidence to consumers and governments.

The objectives of the Market Choice Framework are to:

- minimise disruptions to the supply chain and trade while protecting the health and safety of humans and the environment
- facilitate an effective and efficient risk-based approach to managing supply chain and trade risks while meeting customer requirements
- provide transparency and predictability for supply chain participants, most notably importers and exporters

The Market Choice Framework is targeted at ensuring the commercial introduction of future GM crops is undertaken in a manner that:

- Maintains or enhances trade in Australian grains
- Enables market choice along the supply chain, while being consistent with bulk handling systems and manufacturing practices
- Is open and transparent
- Provides confidence to all stakeholders, particularly to customers, consumers and governments including supporting viability of supply certainty to operators

This document provides the framework for the industry to assess market/trade implications associated with the new GM crop and ensure that the industry has the necessary processes and policies in place to deliver and manage the commercial introduction of the target GM crop.

Market choice – the requirements

The Market Choice Framework is developed against the background of products having been deregulated by the OGTR and therefore have been found to comply with human health & environmental safety regulations and food safety regulations.

The Framework encompasses the elements that the industry has identified as necessary for introduction of a GM crop in a manner that will be least disruptive to the Australian grain supply chain including stewardship, domestic and international regulatory requirements and processes for managing planting seed and grain along the supply chain where GM and non GM products coexist.

Three key elements in the delivery of market choice are the ability of any supply chain participant to:

- Source product that meets a pre-determined set of specifications
- Supply product that meets a pre-determined set of specifications
- Manage their area of the production, processing, manufacturing and delivery of product to a pre-determined set of specifications

The work undertaken through GTA and its Plant Breeding Innovation Committee has identified and confirmed the grains industry supply chain's ability to deliver market choice requirements through the combination of commercial protocols, processes and practices that are either already in place, or can be put in place (**Attachment 1**).

The implementation of these supply chain systems provide the capacity and capability for industry to maintain or enhance trade in Australian grains and their products, and operate in an open and transparent manner.

They will also provide confidence to all stakeholders, particularly to customers, consumers and governments.

The Market Choice Framework developed in 2007 for GM canola identified five market choice criteria to evaluate GM canola against and provide assurance that the GM canola meets the requirements for market choice.

This broader document that presents the industry's Market Choice Framework for all GM grain and seed crops is built on a set of market choice criteria, namely pre-commercial release requirements for:

- Confirmation of Australian approvals
- Market assessment (customer requirements for choice)
- Market risk assessment & approvals
- Market risk mitigation (Low Level Presence/ Adventitious Presence)
- Market risk management protocols (stewardship)
- A Unintended Presence contingency plan

These criteria are described on page 5.

These criteria will be applied by the Industry via GTA to review the readiness of the industry prior to the commercial release of new GM crops in Australia. The review will involve a broad range of stakeholders from across the grains supply chain working together to apply the market choice framework to the crop/trait approved by the OGTR. While the Framework would not be applied until all Australian approvals are in place, technology companies are encouraged to work with the grains supply chain ahead of approval in regard to applying the Framework to the target crop.



GM crops – the criteria

The Australian grains industry encourages companies bringing approved GM crops to market to utilise the market choice criteria as a guidance framework for ensuring that commercialisation of the approved GM varieties enter the nominated supply chain in a manner that minimises disruption and maintains choice.

Approved GM crops are another product within the grains industry supply chain that will be managed according to pre-determined customer and/or regulatory specifications.

The Australian grains industry has demonstrated its capacity and capability to manage seed and grain, including GM crops, to meet customer and consumer demands.

Agriculture occurs in nature and thus, the Australian and global grain industry supply chains routinely produce and handle variations based around product attributes such as quality (e.g. protein % or oil %), and/or other factors which may impact on product quality.

This may be issues such as product variation (e.g. pests, foreign materials, weed seeds), or specialist varieties with specific end uses and/or customer traceability requirements such as the EU sustainability.

The industry has developed and successfully managed the supply chain infrastructure and handling systems that ensure the delivery of products to meet customer specifications and, where required, identity preservation of products and/or varieties from plant breeding through to the producer, onto processor and consumer.

The grains industry recognises that the technology sector has developed comprehensive stewardship program e.g. Excellence through Stewardship and that this provides an excellence program for delivering stewardship as identified by this Framework.



Market Choice Framework

Framework Element	Requirements
1 Australian Approval	Approval granted by OGTR (Human Health Safety and Environment) and if required FSANZ (Food Safety) and APVMA (Pesticide Use)
2 Market Assessment (Customer requirements for choice)	<p>A market assessment to identify key countries of import and their food, feed and environment related regulatory requirements</p> <p>If required, implementation of appropriate processes to manage the GM crop introduction so that choice of production methods and purpose or use (e.g., specialty, identity preservation, commodity) for that crop are available and preserved</p> <p>Identification of risk factors i.e. if a trait has functionally different output properties that make its presence in the general commodity stream inappropriate above certain threshold levels</p> <p>Outcomes of the market & risk assessment used to inform and guide the development of an appropriate stewardship program designed to prevent biotech traits from becoming present in the general commodity stream if their presence would disrupt export or domestic markets</p>
3 Market Risk Assessment & Approvals	<p>GM crops should not be released until regulatory approval has been obtained in all major international markets (identified in the market assessment) for bulk grains and food products, assuming these major markets have functional approval processes in place</p> <p>Conduct a market assessment to identify key countries of production and import prior to the commercialisation of any new GM crop and the GTA Plant Breeding Innovation Committee agree with the supply chain where FFP approvals are required</p>
4 Market Risk Mitigation (Low Level Presence (LLP) Thresholds (note Adventitious Presence (AP) has a zero threshold))	<p>Reasonable thresholds adopted to allow the movement of grains with low level presence – zero thresholds are not feasible for bulk commodity movement of products</p> <p>While a global solution to LLP is still being developed, the technology developer in conjunction with the industry should determine a threshold level at which it is inappropriate for such traits to be present in the general commodity stream because of potential adverse market access and/or food/feed safety or functionality impacts</p> <p>Thresholds should apply to grain and planting seed</p>
5 Market risk management (Stewardship)	<p>The technology provider, in conjunction with the industry, develop and implement stewardship programs that are appropriate for the nominated GM crop. The stewardship program to be sufficient to prevent it from becoming present above established threshold levels in the non-GM stream²</p> <p>If required, supply chain participants develop and implement standards and processes that prevent a GM crop from becoming present above established threshold levels in the non-GM stream</p> <p>Technology providers should make available prior to commercialisation a reliable detection method or test for use by the supply chain that enables identity verification of the GM crop for its intended use and supply chain</p> <p>If required, supply chain participants develop and implement closed loop/identity preserved supply chains (e.g. customer demand, lack of approvals, opportunity to create value, etc.)</p>
6 Unintended Presence (UP) Contingency Plan	<p>The technology provider, in conjunction with the industry, develop a contingency plan to be implemented if a GM crop/event approved in an exporting country, but not yet in Australia, is identified as a UP event in Australia</p> <p>The UP contingency plan should include management and communications strategies which integrates regulatory agencies, the grains/planting seed industries and individual participants affected by the UP event</p>

² This may include recognised programs such as Excellence through Stewardship

Industry ability to deliver market choice

Globally, agricultural commodities are being increasingly differentiated in response to a range of drivers – product safety, consumer preference, product traits, process traits and government regulation.

The Australian grains industry's supply chains are flexible and have the required capacity and capability for existing or new processes to:

- enable GM and non-GM crops to co-exist
- use a semi-integrated system, or
- provide separate supply chains and infrastructure.

The grains supply chain already has protocols, processes and practices available to deliver market choice. Currently, these processes are applied in the growing, transporting, marketing and processing of special malting barley, noodle wheat, canola, sunflower, safflower and maize varieties in Australia. An agreed and comprehensive dataset of measurable standards to specify varietal quality characteristics and parameters is applied along the supply chain as the basis of trade.

The supply chain management processes are driven by standards, quality management procedures, stewardship programs and commercial contractual arrangements.

These support the trade of grain to meet pre-determined industry standards, customer specifications and regulatory requirements at critical points along the supply chain.

The quality management procedures in place vary from formal systems such as those based on Hazard Analysis Critical Control Point (HACCP) and International Organization of Standardization (ISO) through to proprietary systems, industry codes of practices and best agricultural or manufacturing practice. The focus on quality management through the supply chain ensures that the requirements of suppliers and receivers are understood and met, and form part of the verification process.

The industry has a range of stewardship programs and codes of practice or conduct in place or which can be applied to commercial production of GM crops.

These enable sharing of relevant information and consultation for the seamless movement of product into and along the supply chain and, where and when appropriate, the management of non-compliance.

The overarching documents for the industry are the GTA Management of Grain within the Australian Grain Supply Chain: Australian Grain Industry – Code of Practice and the ASF National Code of Practice for Seed Labelling and Marketing. The purpose of these Codes of Practice (Code) are to describe practices that the seed and grain industry use to ensure Australian seed, grain and grain products meet domestic or export customer requirements. Customer requirements include those stipulated in contracts and regulatory requirements at the Australian state, territory and Federal levels and international and overseas country level. There are also a range of industry standards that are covered under this Code.

Commercial contractual arrangements underpin supply chain operations and management. GTA contracts and trade rules are the accepted and recognised basis for facilitating commercial grain trading activity. The GTA contracts and trade rules are currently used in the trading of GM canola and will be used for future GM crops. In addition, there are established contractual procedures between storage and handling operators and marketers, between transport operators and industry participants, and in relation to GM crops there will be contracts between technology developers, seed companies and growers.

These contractual arrangements articulate the responsibilities and obligations of the respective parties and provide a basis for recourse in the event of non-compliance or breach of contract.

Market choice – strong industry support

The Australian grains industry has relied on the adoption of innovation to secure its global competitiveness. The industry needs continued access to new technology to remain at the forefront.

GM crops have been grown for over two decades around the world and numerous studies have proven the environmental, agronomic, economic and social benefits derived from these new technologies and varieties go beyond grain supply chains.

Australia has a strong global reputation of delivering quality grain products that meet customer specifications and a solid track-record of ensuring that the requirements of both domestic and export customers are met.

The industry recognises that not all supply chain participants may choose to adopt GM crops or the resultant grain, and hence, the supply chain must be in a position to offer and provide choice at all times in order to maximise opportunities for all supply chain participants.

The industry also recognises the potential for trade disruptions to occur with GM crops given the rapid growth in the global adoption of biotech crop and the unharmonised regulatory environment that exists globally. Support for the Market Choice Framework from all parties from technology proponents, plant breeders onto producers and through to exporters/domestic customers will ensure the Australian grains industry minimizes risks and maximizes opportunities offered by biotechnology and plant breeding innovations.

The Australian grain industry has demonstrated that it can manage GM crops through the successful introduction and commercial production of GM canola and GM cotton.

The industry will utilise the experience and learnings from Delivering Market Choice with GM Canola to support the introduction of future approved GM crops.



Attachment 1

Reference Documents

- GTA Code of Practice and Technical Guidance documents <http://www.graintrade.org.au/grain-industry-code-practice> and <http://www.graintrade.org.au/grain-industry-code-practice/gta-technical-guidelines>
- Growing Australian Grain <https://grainsguide.grainproducers.com.au>
- ASF National Code of Practice for Seed Labelling and Marketing www.asf.asn.au/code-of-practice/



