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Submission

Grain Trade Australia

to

Review of the National Freight & Supply Chain Strategy

7th September 2023

For more information contact Grain Trade Australia www.graintrade.org.au Phone: 02 9235 2155 Email: admin@graintrade.org.au

1.0 Introduction

Grain Trade Australia (GTA) welcomes the Australian Government 2023 Review of the National Freight and Supply Chain Strategy (Review).

The Australian agricultural industry, and its grain sector is critical to national and rural prosperity providing food security and much needed export revenue whilst generating income and employment opportunities within both urban and rural communities. To maintain and grow productivity in the sector, an effective and efficient supply chain is critical. GTA is committed to assist and provide input to the Government and its Review to achieve its stated objectives.

2.0 Grain Trade Australia's Role

Grain Trade Australia (GTA) is a national member association and is the focal point for the commercial grain industry within Australia.

GTA has over 280 organisations as members. Their businesses range from regional family businesses to large national and international trading/storage and handling companies who are involved in grain trading activities, grain storage, grain marketing advisory services, processing grain for human consumption and stock feed milling. GTA Members are substantial employers, from the farm gate through to end point consumption, and notably in rural and regional Australia. A full list of GTA Members can be found <u>here</u>.

GTA's mission is to 'facilitate trade' in the Australian grain industry. It's products and services, including the Australia Grain Industry <u>Code of Practice</u>, provides a self-regulatory framework across the grain industry to facilitate and promote the trade of grain across the Australian grain value chain.

Within this context, on behalf of its members, GTA provides comment on the Review.

3.0 Grain Industry Sector

The Australian grain industry1 is a major economic contributor in regional Australia and to export revenue, with annual value of production in 2022/23 forecast (excluding rice) to be a record \$30.7 billion at the farm gate and \$28.3 billion of exports², meaning the grain industry is the highest value industry in the agriculture sector, contributing more than 33% of Australia's agricultural gross value of production annually.

The industry achieved record summer and winter production in 2022/23 of 71.7 million tonnes (mmt) following two prior large crops with 68.0 mmt in 2021/22 and 59.9 mmt in 2020/21.

Trade and an efficient supply chain is vital for the Australian grain industry and regional communities, with the Australian grain industry being highly export oriented e.g., 65 -75% of grain is exported.

The grain industry supply chain is geographically diverse and is spread across 31 operational bulk port terminals operated by 18 companies, and multiple container packers and exporters in the 5 major producing States. The Australian domestic market is the largest market for Australian grain and consumed 17.5m metric tonnes of grain in 2021-22³

² Source: ABARES, 2023

¹ Grains include wheat, coarse grains, oilseeds, oilseed meals and pulses

³ ACCC – Bulk grain ports monitoring report December 2022

Producing on average 45mmt tonnes from approximately 22,300 farms production units⁴ the grain industry has an **inordinately heavy reliance on the nation's road and rail networks including rural branch lines and the many non-sealed farm access and rural roads.**

The grains industry utilises all 5 road categories under the Heavy Vehicle Road Reform (HVRR) categorisation model.

Table 1. HVRR Road Categorisation Model

Road Category	Description
R1	R1 roads are freeways, motorways, and tollways that have divided carriageways with two or more lanes in each direction and sealed shoulders on both sides of each carriageway. These roads form major urban and interurban traffic movement routes.
R2	R2 roads are urban highways or major roads that are not a freeway but may have divided carriageways and two or more lanes in each direction. These roads always have sealed shoulders.
R3	R3 roads are urban arterials and rural highways that have single carriageway with one lane in each direction. These roads may have sealed or unsealed shoulders.
R4	R4 roads are collector or distributor roads. These are roads with no requirements for shoulders.
R5	R5 roads are local or access roads which provide property access.

Historically, the Australian grain supply chain operated under a simple aggregation system with farmers delivering their produce approximately 10-30kms at harvest time to local collection points from where the grain would, over time be delivered to domestic and export destinations. This model has now changed with the industry increasingly moving to a disaggregated market with:

- Increased use of farm storage, with the Grains Research and Development Corporation (GRDC) reporting approximately 41 percent of the total grain production of 45mmt can now be stored on farm. This equates to 18.5mmt.
- Rationalisation of bulk handler receival sites and service arrangements.
- Investment in new seaport terminal facilities and the introduction of Mobile Bulk Loading capability.
- Privatisation of the above rail operating companies and their rolling stock assets and some of the below rail track networks. Removal of government ownership and in some states Community Service Obligations (CSOs) for rail leading to a transport modal shift from rail to road.
- Increased use of containers for grain exports given favourable back freight opportunities combined with some international consumer preferences in delivery and order size.
- Increased commodity trading activity with multiple aggregators for most sales contracts and a dramatic increase in supply chain participants resulting in competing demand for common use infrastructure and for deliveries direct to port to meet vessel schedules.

The increased complexity in the grain supply chain has led to challenges and constraints in peak periods. This evolving model and its complexity need to be understood and factored into all government supply chain planning frameworks.

4.0 Grain Industry Capability and Competitiveness

Increasingly sophisticated global markets dictate the fortunes of the Australian grain industry. Australia does have some inherent advantages in the global market on account of our reputation for producing a clean quality product and the sea freight advantage accorded by our proximity to key South East Asian markets.

Supply chain related innovation is essential, and requires leadership, planning and capital investment to ensure an efficient globally competitive grain industry for Australia. Critical to the value proposition for Australian grain in the export market, is the ability for market participants to "front-end" (i.e. heavily concentrate the shipping program in the immediate six months following harvest) their sales and shipping programs prior to new season northern hemisphere grain becoming available to compete with Australian grain in the international markets. This peak demand requirement has resulted in the grain supply chain demanding overcapacity with consequential cost implications.

Recent record production has provided some challenges and with the industry response demonstrating a capacity to innovate and thrive under pressure whilst maintaining the reputation of Australia's grain quality, its food safety and our customer's confidence in the capacity and capability of Australia's grain and the grain supply chain.

Global food security is becoming increasingly important and challenging. As conflicts and the environment create concerns and complexity, the facilitation of trade in food between countries and counterparties grows in importance to global food security. The issues around global food security expose the importance of efficient trade and supply chains, as well as a political tendency towards protectionism in some economies, which ultimately will lead to inefficient outcomes.

Whilst the industry will continue to innovate and invest it is critical Government investment and structural reforms also advance to ensure supply chain remains robust and responsive to the market demands.

5.0 Government National Freight and Supply Chain Strategy

GTA members are engaged and will assist government policy towards improving the national supply chain, as this area is the basis of a large proportion (up to 35-40%) of the cost base in the production and delivery of grain to market. High supply chain costs damage the competitiveness of Australian grains in world markets, regardless of market access settings as well as impacting productivity within the Australian economy.

The cost of the moving grain through the supply chain, impacts the value of all grain that moves through it, irrespective of the grain quality and destination market.

5.1 Comments on the Review <u>Discussion Paper</u> issues:

5.1.1 Are the Strategy's current goals relevant and are other required?

The Strategy's goals are still relevant and considering the impact of factors such as climate change, the pandemic and the Ukraine crisis and other global tensions it is imperative that increase focus and intensity as industry and Government to achieve these goals.

In GTA's view the six goals are broad and capable of inclusion of all existing or new imperatives.

5.1.2 Should the NAP focus on a smaller number of targeted actions?

GTA suggest the NAP should progress some prioritisation of the targeted actions to ensure resources are better utilised and priority initiatives are actioned.

5.1.3 What KPIs would be useful and what are the data requirements?

Given the associated problems and costs that the different Government jurisdictions cause the flow of grain across state borders and as most of the heavy lifting needs to be done by Governments any KPIs need to focus on effective engagement by the local, State and Federal Government in the strategy. This includes the provision of information, engagement in cross jurisdictional planning, decision making and the collection and allocation of Government funding for supply chain infrastructure.

One example of a potential KPI is Governments across Australia utilising different methodologies for rating the capability of infrastructure and for valuing the cost and benefit of investment in infrastructure. All cost benefit valuing initiatives should be based on a consistent methodology that is hopefully consistent with Infrastructure Australia. This will better allow for comparative analysis of the value of projects and will help to ensure a standardised method. The methodology should include social and environmental impacts as well as pure economic value. Therefore, there needs to be a KPI that all jurisdictions – including local councils - apply an agreed consistent methodology for valuations.

5.1.4 What outcomes / findings should the Review consider?

The Review should consider all and any relevant reports including the Productivity Commission – <u>Australia's Maritime Logistics Review</u> and its Recommendations. This Report examines the performance of Australia's maritime logistics system, long term trends in system performance, competition, industrial relations, infrastructure constraints and technology uptake.

There are several Recommendations in the review that need Government action and engagement to deliver system efficiency and structural gains. These must be considered as part of the National Supply Chain Strategy as failure to act on lead to further serious detrimental impacts on the trade of grain into the export market in shipping containers.

5.1.5 Governance Arrangements – are they appropriate?

It is difficult to provide detailed comment on the efficiency of the Governance and structural arrangements from the limited diagram except to say that based on this diagram the model raises serious concerns as to its structure, clarity of responsibilities/accountabilities and therefore its overall appropriateness.

There appears to be no one group or resources fully allocated to the Strategy and no single point of control and the only 'Working Group' in the structure has a stated role to:

- 1. Manage the annual reporting and review the process.
- 2. Where appropriate develop a coordinated response to planning and other emerging freight issues.
- 3. Report to ITSOC, the group whose only responsibilities are:
 - a. to support the relevant ministers; and to
 - b. ensure the Working Group completes its annual reporting and review process

As stated, this appears inappropriate to achieve any outcomes. GTA suggests the existing Working Group should be replaced with a full-time working group compiled of cross jurisdictional Government and industry experts capable of progressing the Strategy. This Working Group should report to a council consisting of the Freight Industry Reference Panel and the ITMM. Anything less will weaken the opportunity to achieve the Goals and is a lost opportunity for Australia.

5.2 Prior Submission Recommendations

GTA provided a detailed Submission into the Strategy in 2017. We consider this previous submission to be valid and relevant to this forthcoming review and consideration as part of the Strategy.

The previous recommendations are provided below:

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Previous GTA Recommendations to Supply Chain Review		
1.	The Inquiry is resourced adequately to include extensive industry engagement, and the analysis and review of past industry reports.	
2.	Supply Chain Funding is prioritised on economic value principles.	
3.	Ensure a standard investment methodology.	
4.	Engage further with industry to forecast, plan and prepare for change.	
5.	Ensure the consideration of value uplift when scoping projects to consider expansionary value.	
6.	A standard national approach is applied to supply chain related regulation and policy.	
7.	Supply Chain Funding is prioritised on economic value principles.	
8.	Continued use of independent agencies and structural reform of the different government sectors within the supply change is required.	
9.	Government clarify its role in the provision of transport infrastructure.	
10.	Engage with stakeholders to finalise the new proposed road funding model.	
11.	Include the rural branch line network as part of the proposed road funding model and as part of this review consider an appropriate national rail access regime.	
12.	Review impediments to the efficient operation of the existing rail network.	
13.	Inquiry Panel and supporting staff must engage and understand the complexities of the grain supply chain and the global market influences.	
14.	Government must invest in managing implementation of any outcomes to ensure a consistent application without cross border variances.	

6.0 Conclusion

The Australian grains industry is a extensive user of the national freight network and supply chain and is consequently significantly impacted by its efficiency in terms of costs, investment, regulation and overall productivity.

GTA welcomes this Review and is committed to assisting with shaping the outcome to ensure the grain industry can continue to provide economic value to the nation as a whole.

GRAIN TRADE AUSTRALIA

Membership List as of 5 September 2023

Organisation

Ordinary Member (Trading)

Level A1 (over 7 Million Tonnes) CBH Grain Pty Ltd Viterra Australia Pty Ltd Graincorp Operations Ltd

Level A2 (5 - 7 Million Tonnes)

Level A3 (3 - 5 Million Tonnes) Cargill Australia Limited

Level A4 (1.5 - 3 Million Tonnes)

ADM Trading Australia Pty Ltd Louis Dreyfus Emerald Australia Pty Ltd Arrow Commodities Pty Ltd Bunge Agribusiness Australia Pty Ltd Australian Grain Export Pty Ltd

Level B1 (1.0 - 1.5 Million Tonnes)

Manildra Group CHS Broadbent Pty Ltd Riordan Grain Services George Weston Foods Limited

Level B2 (500,000 - 1 Million Tonnes)

Centre State Exports Pty Ltd Inghams Enterprises Pty Ltd Ridley Agriproducts Pty Ltd Riverina (Australia) Pty Ltd Wilmar Gavilon Pty Ltd J K International Pty Ltd ETG Commodities Pty Ltd

Level B3 (250,000 - 500,000 Tonnes)

Allied Pinnacle Pty Ltd Cofco International Robinson Grain Trading Co Pty Ltd Quadra Commodities Pty Ltd Brahman Commodities Pty Ltd Boolah Farms Pty Ltd Fletcher International Exports Pty Ltd K M & W M Kelly & Sons Demeter Grains

Level C1 (over 10 employees, under 250,000 Tonnes)

Adams Australia Pty Ltd Agracom Pty Ltd Agrisk Management Pty Ltd AGT Foods Australia Associated Grain t/a Agrocorp Processing Australia Australian Food and Fibre Australian Fresh Milk Holdings (AFMH) BFB Pty Ltd Blairs Produce Company Castlegate James Australasia Pty Ltd Coprice Darwalla Milling Co Pty Ltd Contact

Website /Phone

Mr Jason Craig Mr Philip Hughes Mr Robert Spurway

Mr Zsolt Kocza

Mr Darryl Borlase Mr David Johnson Mr Dominic Vanzella Mr Stephen Bennett Mr Tim Martin

Mr Peter Sloan Mr Steve Broadbent Mr Mark Lewis Mr Mark O'Brien

Mr Jeff Voigt Mr Matt Clarke Mr Michael Reeves Mr Gareth Stapleton Mr Matt Albion Mr Sandeep Mohan Mr Peter McMeekin

Mr Brett Duczmal Ms Sara Pan Mr Gary Robinson Mr Robin Cassar Mr Michael Aikman Mr Stuart Tighe Mr Joe Masters Mr Matt Kelly Mr David Oates/Barry Mansfield

Mr Ian Mack Mr Joe Hallman Mr Brett Stevenson Mr Michael Brittain Mr Bhuvan Gandhi Mr Peter Webb Ms Jill Smith Mr Shane Bird Mr Sean Blair Mr Ross Giovanetti Ms Krissy Campbell Mr Gary Heidenreich cbh.com.au glencoreagriculture.com.au graincorp.com.au **3**

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Level C2 (under 10 employees, under 250,000 Tonnes)

A T Waterfield & Son Pty Ltd A W Vater and Co Advantage Grain Pty Ltd Access Grain Pty Ltd Aditya Birla Global Trading (Australia) Pty Ltd Agmark Commodities Agri Om Australia Pty Ltd Agri-Oz Exports Pty Ltd Agromin Australia Pty Limited Australian - Asian Agricultural Exports Pty Ltd Australian Choice Exports Pty Ltd Australian Grain Storage Australian Growers Direct Pty Ltd Australian Mungbean Company Pty Ltd Avoca Grain Storage Pty Ltd Baker Grain Boort Grain Co-Operative Broun and Co Grain Pty Ltd C & S Trading Pty Ltd C K Tremlett Pty Ltd Carpendale Agri Pty Ltd Carson Stockfeeds Pty Ltd Chester Commodities Pty Ltd CL Commodities Pty Ltd Coorow Seeds Cory Johnston (Aust) Pty Ltd Craig Tyack Grain Trading Defiance Maize Products Pty Ltd Direct Commodities Pty Ltd

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Transport Operator

Crawfords Freightlines Pty Lts Gehrke Ag Pty Ltd Hamilton Contracting (NSW) Pty Ltd Horne Ag Logistics Pty Ltd Pacific National (NSW) Pty Ltd SEAWAY Intermodal Pty Ltd

Broker Large

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Medium

Fox Commodites Pty Ltd Grain Brokers Australia Horizon Grain Brokers Pty Ltd iGrain.com.au Pty ltd Rain Argibusiness StoneX Financial Pty Ltd McDonald Pelz Australia Pure Grain Network Pty ltd Quest Commodities Pty Ltd Teague Australia Pty Ltd

Sole Operator

A C Grain Allied Grain Pty Ltd Cogeser (Australia) Pty Ltd Farm Tender Lotema Pty Ltd Mallon Commodity Brokering Perkins Commodity Brokers Woodside Commodities Pty Ltd

Corporate

Large

ASX Limited Australian Grain Technologies Pty Ltd Barrett Burston Malting Co Pty Ltd Boortmalt Asia Pacific Pty Ltd Commonwealth Bank of Australia NSW Ports Symbio Laboratories

Medium

AgriDigital Agrifood Technology Pty Ltd Amspec Australia Pty Ltd Australian Superintendence Company Commodity Inspection Services (Australia) Pty Ltd Foss Pacific Pty Ltd Holding Redlich HFW Australia Intertek Mars Petcare t/a Mars Birdcare Oldendorff Carriers SBA Law SGS Australia Pty Ltd T-Ports Pty Ltd Mr Mark Madjarevic Mr Tim Dean Mr Geoff Hammon Mr Joel Watson Mr Gesheng Shen Mr Karl Hendy Mr Steve Sloss Mr Tim Byass

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Small

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International Affiliate

CIS - Commodity Inspection Services

Industry Association

Australia Export Grain Innovation Centre Grain Growers Limited Grain Industry Association of WA Grain Producers Australia Ltd NSW Farmers Association Stock Feed Manufacturers' Council of Australia

Merchant Association

Grain Industry Association of SA Grain Industry Association Of Victoria Grain NSW Inc Queensland Agricultural Merchants Inc.

Life Members

Mr Mervyn May

Mr Jeremy Brown

Mr Andrew Woodhouse Mr Lloyd George Mr Shane Sander Mr Alex Campbell Mr Chris Whitwell Mr Jason Fleming Mr Nathan Cattle Mr Ed Scamps Mr Michael Parry Ms Tracey Lehmann Mr Donald McTaggart Mr Robert Imray Mr Malcolm Finlayson Mr Jarrod Tonkin Ms Leah Petrie Mr Geoff Webb Mr Lucas Anstiss Mr Chris Hood Mr Eric Chen Mr Stephen Schumacher Mr Ron Harris Mr Ole Houe Mr Rob Martin Mr Nick Carracher Ms Kareen Durr Mr Mark Martin Mr Gerard McMullen Mr Daniel Marsh Mr Mark Murphy Ms Debbie Newmarch Mr Yasuhide Okumura Mr Raul Ovelar Mr Jerome Critch Mr Kevin Schwager Mr Peter Longhurst Mr James Maxwell Mr Ian Dalgliesh Mr Chris Heinjus Mr Ashley Denishensky Mr David Hudson Mr Tom Hage Mr Chris Tonkin Mr Rhys Richards Mr Andrew Alexopoulos Mr Jon Bucknall

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