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22 January 2019

National Traceability Project **Trade and Market Access Branch Department of Agriculture and Water Resources** GPO Box 858 Canberra City ACT 2601

Submitted via on-line Consultation Hub

Dear Sir/Madam

#### **RE: Survey on Principles for the National Traceability Framework**

#### 1. About Grain Trade Australia

Grain Trade Australia (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 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 GTA members is attached.

Within this context, on behalf of its members, GTA provides comment on the Principles for the National Traceability Framework.

#### 2. General Comments on the Project

GTA welcomes the opportunity to be involved in this Project given there is shared objective to ensure the Project and its outcome supports or enhances existing industry systems, regulatory standards and processes developed to facilitate commercial and non-restrictive trade.

Australia enjoys an enviable position in world agricultural trade as a result of its existing regulatory standards, systems and processes that have been jointly developed by industry and government over many decades. It is important to note Traceability is an adjunct to these existing systems standards and processes.

In the grain industry management of product quality and food safety is a process of quality assurance where risks are analysed, and process controls are employed to minimise risks as much as practically possible. The Australian grain industry Quality Assurance process has a strong focus on the assessment and discovery of any grain quality issues prior to the product being consigned to the domestic or export customer.

Traceability, in the grain industry today, primarily supports the grain industry Quality Assurance process in providing the capability to assess the source of out of specification grain when Quality Assurance process and/or customers detect an issue. Whilst this process is currently not automated or systemic it has been considered appropriate for the risk given grain is a hard seeded, non-perishable raw ingredient used to produce processed feed and foods.

Currently, the grain industry does not believe that the case exists to change from this 'trace-back' approach to any proposed 'live' traceability process. An extensive cost benefit analysis would need to be undertaken to support any change. However, it is noted that in some identity preserved products for niche markets, traceability is applied to meet customer requirements and may involve some elements of a shared traceability process.

### 3. Specific Comments on the Principles for the National Traceability Framework

The Principles for the National Traceability Framework (Principles) have progressed from the initial draft version and are reflective of industry working with government to establish Principles that are commercial, practical and supportive of the existing jointly developed regulatory standards and systems.

GTA has made some suggested further modifications to the Principles and provide these in 'mark-up' within the text in the table below:

#### Table 1. GTA proposed Modifications to the Principles

#### **Principles**

The National Traceability Framework is underpinned by the following principles (Note: not in the order of priority):

1.**Government-industry partnerships:** supporting government's role to <u>asconsult</u> -and regulate<u>er to</u> the extent necessary -and assisting industry to harness commercial opportunities <u>whilst</u> and managing e-risks <u>of food safety</u>, through a combination of voluntary and regulated approaches.

2. **Trust:** <u>Supporting existing industry systems and</u> facilitating community, consumer and trading partner trust by enabling claims to be <u>accurately assessed</u>. <u>verified</u>.

3.**Information:** enabling data collection that is <u>meaningful</u>, timely, accurate, and can be readily shared for mutually agreed purposes when it is economically beneficial to do so.-

4. **Visibility through the entire supply chain:** enabling tracing of agricultural commodities<sup>4</sup> through the entire-supply chain. Where required this iscovers activities sections F from the point of origin, through all stages of production, processing, and distribution.<sup>2</sup>

5.**Use of existing systems:** <u>Contribute to the effectiveness of leveraging and building on existing industry</u> systems, where <u>required and</u> possible, to reduce cost and improve uptake.

6.**Harmonisation with standards:** implementing relevant international and national <u>regulatory</u> standards, <u>where required</u>, and aligning with them to facilitate trade.

7. Flexible and outcome-based solutions: accommodating a broad range of <u>justified</u> industry and government needs across agricultural commodities, varying in their complexity and reasons for traceability.

8.**Industry ownership:** developing approaches to tracing agricultural commodities, as the primary responsibility of industry, which is supported by governments.4

Thank you for your consideration of this response.

Pat O'Shannassy Chief Executive Officer

# GRAIN TRADE AUSTRALIA

#### Membership List as at 10 December 2018

Website /Pho	Contact	Organisation
		nary Member (Trading)
		Level A1 (over 7 Million Tonnes)
cbh.com	Mr Jason Craig	Co-operative Bulk Handling Limited
glencoreagriculture.com	Mr Philip Hughes	Glencore Agriculture Pty Ltd
		Level A2 (5 - 7 Million Tonnes)
graincorp.com	Mr Klaus Pamminger	Graincorp Operations Ltd
		Level A3 (3 - 5 Million Tonnes)
adm.co	Mr Darryl Borlase	ADM Trading Australia Pty Ltd
cargill.com	Ms Penne Kehl	Cargill Australia Limited
		Level A4 (1.5 - 3 Million Tonnes)
bunge.com/Agribusine	Mr Stephen Bennett	Bunge Agribusiness Australia Pty Ltd
cofcoagri.com	Mr Yebin Li	Cofco International
emeraldgrain.co	Mr David Johnson	Emerald Grain Pty Limited
plumgrove.com	Mr Tony Smith	Plum Grove Pty Ltd
		Level B1 (1.0 - 1.5 Million Tonnes)
arrowcom.com	Mr Dominic Vanzella	Arrow Commodities Pty Ltd
louisdreyfus.com	Mr Robert Green	Louis Dreyfus Company Australia Pty Ltd
australian grain armont arm	Mr Prott Dodgon	Level B2 (500,000 - 1 Million Tonnes)
australiangrainexport.com.	Mr Brett Dodson	Australian Grain Export Pty Ltd
broadbentgrain.com.	Mr Justin Fay	CHS Broadbent Pty Ltd
centrestateexports.com. gwf.com.	Mr Jeff Voigt Mr Mark O'Brien	Centre State Exports Pty Ltd George Weston Foods Limited
agriproducts.com.	Mr Michael Reeves	Ridley Agriproducts Pty Ltd
riordangrains.com	Mr Mark Lewis	Riordan Grain Services
riverina.com	Mr Kenji Kumoi	Riverina (Australia) Pty Ltd
		Level B3 (250,000 - 500,000 Tonnes)
agfarm.com.	Mr Ron McCalman	Agfarm Pty Ltd
agracom.com	Mr Joe Hallman	Agracom Pty Ltd
agrigrain.co	Mr Jeremy Brown	AGRIGRAIN
02 9499 41	Mr Brett Stevenson	Agrisk Management Pty Ltd
alliedpinnacle.co	Mr Josh Lawrence	Allied Pinnacle Pty Ltd
lemprieregrain.com	Mr Jonathan Holdsworth	Lempriere Grain Pty Ltd
robinsongrain.com.	Mr Gary Robinson	Robinson Grain Trading Co Pty Ltd
uwetypical.co	Mr Jimmy Liu	United World Enterprises Pty Ltd
07 3713 87	Mr Matt Albion	Wilmar Gavilon Pty Ltd

#### Ordinary Member (Trading) (contd)

Level C (under 250,000 Tonnes) A T Waterfield & Son Pty Ltd A W Vater and Co Access Grain Pty Ltd Adams Australia Pty Ltd **Agmark Commodities** Agri Om Australia Pty Ltd Agri-Oz Exports Pty Ltd Agriex Australia Pty Ltd Agrifoods Australia Agromin Australia Pty Limited **AGT Foods Australia AMPS Agribusiness Group** Associated Grain Auscott Ltd AusiCan Commodities Australian - Asian Agricultural Exports Pty Ltd Australian Choice Exports Pty Ltd Australian Grain Storage Australian Growers Direct Pty Ltd Australian Mungbean Company Pty Ltd Australian Storage Alliance Pty Ltd **Baker Grain** Berriwillock Grain Storage Co-Operative Ltd **BFB** Pty Ltd **Blairs Produce Company Boolah Grains Pty Ltd Boort Grain Co-Operative** Broun and Co Grain Pty Ltd C & S Trading Pty Ltd C K Tremlett Pty Ltd **Carpendale Commodities Cameron Pastoral Company Pty Ltd** Castlegate James Australasia Pty Ltd **CL Commodities Pty Ltd Cleveland Agriculture Coorow Seeds** COPRICE Cremer Australia Pty Ltd DA Hall and Co **Dalby Bio-Refining Limited** Dalgrains (Qld) Pty Ltd Darwalla Milling Co Pty Ltd **Deacon Seeds Company Deckert Group Pty Ltd Defiance Maize Products Pty Ltd Demeter Cormack Pty Ltd Direct Commodities Pty Ltd Donnellons Bulk Haulage Pty Ltd** ED & F Man Grains Australia East Coast Stockfeed Pty Ltd **Elders Grain Esperance Quality Grains** Export Trading Group Australia Pty Ltd Feed Central Pty Ltd

Mr Brad Waterfield Mr Kim Vater Mr Wade Humphreys Mr Ian Mack Mr Richard Alcorn Mr Kishore Bulchandani Mr Francois Darcas Mr Joseph Khnessier Mr Rob Anderson Mr Rajni Patel Mr Peter Wilson Mr Simon McDougall Mr Todd Jorgensen Mr Peter Webb Mr Douglas Saunders Mr Mick Connolly Mr James Hunt Mr Matt Bailey Mr Tom Lucas Mr Damien White Mr Jon Bucknall Mr Richard Baker Mr Tony Bellinger Mr Terry Brabin Mr Sean Blair Mr Stuart Tighe Mr Jon Bucknall Mr Wal Broun Mr Craig Scholz Mr Andrew Tremlett Mr Andrew Kluck Mr Ken Cameron Mr Ross Giovanetti Mr Robert Lean Mr Chris Hurwood Mr Brian Pover Mr Lyndon Benecke Mr Scott Haughton Mr Bruce Holden Mr Tobin Cherry Mr Gary Heidenreich Mr Terry Deacon Mr Chris Deckert Mr Rodney Walker Mr David Oates Mr Hamish Robertson Mr Bill Donnellon Mr Oliver Reid Mr Stuart Dolden Mr Lachlan Allen Mr Neil Wandel Mr Shavne Clark

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Mr Tim Ford

## Level C (under 250,000 Tonnes) cont.

**Fellows Nominees** Fertinvest Australia Pty Ltd **Findlays Barellan Five Star Stock Feeds** Fletcher International Exports Pty Ltd **Golden Harvest Grain Exports** Gold Star International Pty Ltd Grain Direct Australia Grain Link (NSW) Pty Ltd Grain Link WA Pty Ltd Grainforce Pty Ltd **Grainpro Pty Limited** GrainTrend Pty Ltd **Greentree Farming** GV Grain & Fodder Hanlon Enterprises Grain Harberger's Farm Supplies (Trading) Pty Ltd Hassad Australia Operations Company Pty Ltd Independent Grain Handlers Pty Ltd **Irwin Stockfeeds** Itochu Australia Ltd J K International Ptv Ltd J W Koek & Company James Stock Feed and Fertilizer Pty Ltd Jerilderie Grain Storage & Handling KB Agri Services Pty Ltd K M & W M Kelly & Sons Kangaroo Island Pure Grain Pty Ltd Kennett Rural Services Pty Ltd Lachlan Commodities Pty Ltd Laharum Bulk Handling Co Lake Grain Pty Ltd Lane Grain Pty Ltd Laragon Almond Processors Pty Ltd Laucke Flour Mills P/L Lawson Grains Pty Ltd LDC Enterprises Australia Pty Ltd LINX Cargo Care LPC Trading Pty Ltd Malteurop Australia Pty Ltd Matthews Transport and Grain Traders Max Grains Pty Ltd MC Croker Pty Limited McNaughts Grain & Fertilizer Pty Ltd Melaluka Trading Pty Ltd Mellco Pty Ltd Moulamein Grain Co-Operative Ltd Moxey Farms Pty Limited MSM Milling Pty Ltd Murrumbidgee Grains Pty Ltd Namoi Cotton Ltd Nandaly Grain Co-Operative Ltd Network Grains Pty Ltd Newcastle Agri Terminal Pty Ltd Northern Riverina Grains Pty Ltd **OOMA Enterprises NSW Pty Limited** 

Mr Paul Fellows Mr Greg Sandral Mr Neil Findlay Mr Tim Huggins Mr Kurt Wilkinson Mr Chandru Hiremath Abhishek Kotkar Mr Chris Kochanski Mr Paul Pearsall Mr Andrew Goyder Mr Derek Larnach Ms Angela Bonfante Mr Sanjiv Dubey Mr David Brown Ms Joanne Harry Mr Peter Gerhardy Mr Reece Harberger Ms Terrie Morgan Mr Brad Bryant Mr Bryan Irwin Mr Justin Swan Mr Sandeep Mohan Mr Brian Algate Mr Adrian Moule Mr David Barlow Mr Karl Bliss Mr Matt Kelly Ms Emma Tonkin Mr Andrew Kennett Mr Tony Cogswell Mr Donald Carter Mr Derek Davis Mr Garry Lane Mr Mark Webber Mr Roger Laubsch Mr Angus Blair Mr Richard Porter Mr David Simpson Mr Simon Langfield Mr Jack King Mr Neville Matthews Mr Jack Fahv Mr Greg Carroll Mr Daniel McNaught Mr Simon Pritchard Mr Steve Mellington Mr Tony Bellinger Ms Jill Smith Mr Peter MacSmith Mr Peter Hassall Mr Shane McGregor Mr Tony Bellinger Mr Craig Dennis Mr Jock Carter Mr Jon Bucknall Mr Malcolm Berry

#### Level C (under 250,000 Tonnes) cont.

Origin Grain Pty Ltd **Parkinson Bros** PB Seeds Pty Ltd PeaCo Pearson's Grain Pty Ltd Peters Commodities Pty Ltd Phoenix Global Australia Pty Ltd Premium Grain Handlers P/L Preston Grain Pulse Association of the South East (PASE) Inc Quadra Commodities Pty Ltd **Quattro Ports Quirindi Grain & Produce Reid Stockfeeds Pty Ltd Rhodium Trading Australia Pty Ltd** Rivalea (Australia) Pty Ltd - Animal Nutrition Riverina Oils & BioEnergy Pty Ltd **Roty Grain Store RT Wallace Pty Ltd** Ruddenklau Grain Pty Ltd Rural Logic (Aust) Pty Ltd SANWA Pty Ltd Seedhouse Tasmania Shannon Bros Bulk Haulage Silo Bag Grain (NSW QLD) Pty Ltd Societa Cofica Pty Ltd Southern Cotton Trading Pty Ltd Southern Cross Agricultural Exports P/L Southern Grain Storage Pty Ltd Southern Stockfeeds (Operations) Pty Ltd Spagricon Australia Pty Limited Spring Market Trading Company Standard Commodities Australia Pty Ltd Sudima Australia Pty Ltd Summer Hill Grains SunPork Farms Feed Mills Swiss Singapore (Australia) Pty Ltd Tasmanian Agricultural Producers Pty Ltd Thallon Grains Pty Ltd **TSS Grain Twynam Pastoral Company** Ulusoy Asia Pacific Unigrain Pty Ltd Unique Grain Management Pty Ltd **Universal Commodity Management** W B Hunter Pty Ltd Ward McKenzie Pty Ltd Watershed Commodities WHG Oceania Pty Ltd Wilken Grain Wimpak Pty Ltd Woods Grain Pty Ltd WW Agri Pty Ltd XLD Grain Pty Ltd Yenda Prods Grain Pty Ltd

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#### **Transport Operator**

Gehrke Grains and Transport Pty Ltd Hamilton Contracting (NSW) Pty Ltd Pacific National (NSW) Pty Ltd Wakefield Grain Export Services

#### Broker

#### Large

Medium Grain Brokers Australia Horizon Grain Brokers Pty Ltd INTL FCStone Pty Ltd McDonald Pelz Australia Perkins Commodity Brokers Teague Australia Pty Ltd

#### **Sole Operator**

A C Grain ACCB Australia Allied Grain Pty Ltd Asiagrain Bulk Commodities pty ltd Cogeser (Australia) Pty Ltd Esquire Commodities Pty Limited Farm Tender Lotema Pty Ltd Mallon Commodity Brokering Quest Commodities Pty Ltd Wimmera Mallee Grain Services Woodside Commodities Pty Ltd

#### Corporate

Large ASX Limited Australia And New Zealand Banking Group Australian Grain Technologies Pty Ltd Commonwealth Bank of Australia

#### Medium

Agrifood Technology Pty Ltd Amspec Australia Pty Ltd Australian Superintendence Company Commodity Inspection Services (Australia) Pty Ltd Foss Pacific Pty Ltd Holding Redlich Holman Fenwick Willan Intertek Merricks Capital Pty Limited SBA Law SGS Australia Pty Ltd T-Ports Pty Ltd Viridis Ag

#### Small

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Mr Jeff Winspear Mr Ash Munro Mr Brett Cooper Mr Peter Geary Mr Craig Perkins Mr Tim Teague

Mr Adam Clarke Mr Andy Cunliffe Mr Angus Wettenhall Mr Michael Moss Mr Robert Luetolf Mr Rowan Relton Mr Matt Henke Mr Todd Lees Mr Ian Mallon Ms Jayne Barker Mr Rodney Edgerton Mr Hamish Steele-Park

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#### **Corporate (cont.)**

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#### **International Affiliate**

CCIC Australia Pty Ltd 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 Victorian Farmers Federation

#### **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 Christopher Kelly Mr Geoff Honey Mr Nathan Cattle Mr Ed Scamps Mr Michael Parry Ms Tracey Lehmann Mr Donald McTaggart Mr Robert Imray Mr Malcolm Finlayson Mr Jarrod Tonkin Mr Geoff Webb Mr Chris Hood Mr Stephen Schumacher Mr Ron Harris Mr Simon Clancy Mr Lachie Stevens Mr Mark Martin Mr Gerard McMullen Mr Scott Still Mr Mark Murphy Ms Debbie Newmarch Mr Yasuhide Okumura Mr Raul Ovelar Mr Rod Buckle Mr Jerome Critch Mr Mark Sloan Mr Peter Longhurst Ms Hannah Janson Mr Ian Dalgliesh Mr Chris Heinjus Mr Robert Ford Mr David Hudson Mr Tom Hage Mr Chris Tonkin

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