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1 May 2023

The Coordinator Australia-Thailand Strategic Economic Cooperation Agreement Free Trade Agreements Division Department of Foreign Affairs and Trade RG Casey Building John McEwen Crescent Barton ACT 0221 Via Email: <u>Thailand.seca@dfat.gov.au</u>

Re: Australia-Thailand Strategic Economic Cooperation Agreement (SECA) Submission

1.0 About GTA

Grain Trade Australia (GTA) is a national association and is the focal point for the commercial grains industry within Australia. The role of GTA is to provide a framework across Industry to facilitate and promote the trade of grain. GTA facilitates trade and works to provide an efficient, equitable and open trading environment by providing leadership, advocacy, and commercial support 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 Trading Standards and/or Trade Rules.

GTA has established the Australian Grain Industry Code of Practice. All GTA Members are required to adhere to the Code of Practice. GTA Members are drawn from all sectors of the grain value chain from production to domestic end users and exporters. GTA has over 270 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, processing grain for human consumption and stock feed milling. A list of GTA Members is here and attached.

GTA welcomes the opportunity to make this submission to the Australia-Thailand Strategic Economic Cooperation Agreement (SECA) and supports the commencement of negotiations for the SECA.

2.0 Introduction

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 \$28.4 billion at the farm gate and \$27.1 b 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 at 72.3 million tonnes following two prior large crops with 2021/22 a 67.4 million tonne crop, and 59.9 million tonnes in 2020/21.

Trade 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 Australian grain industry is well positioned to supply markets such as Thailand. Thailand is the second biggest economy in the ASEAN and is increasing its demand for imported food including grain, offering many opportunities for the Australian grain sector.

GTA supports the commencement of negotiations for the SECA as the Thailand-Australia relationship is important for many reasons. SECA presents a unique opportunity to deepen and strengthen trade and economic ties with Thailand. Thailand is a significant market for a range of cereal grains, oilseeds, oilseed meals and other grain products. The SECA has the potential to significantly grow the grain trade to Thailand, but to also contribute positively to Thailand's grain and food sector. The proximity, population and

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

² Source: ABARES, 2023

growing purchasing power of Thailand's consumers will create new opportunities for Australian agricultural exports, particularly grain.

Increasing existing and opening new export market opportunities for Australian grain and products and reducing distortions in global markets are key priorities for the industry. GTA consider a successful bilateral agreement with Thailand could potentially provide a significant increase in export value to the Australian grain industry. However, growth in viable opportunities will require the SECA agreement to deliver commercially meaningful gains in market access,

GTA supports a comprehensive and high-quality trade agreement with Thailand that provides improved market access outcomes for grain and grain products, such as improved access to Thailand's large and growing feed grain market. The SECA is a good initiative, and it is hoped it will complement the existing Thailand-Australia Free Trade Agreement (TAFTA).

However, for market access opportunities to be maximised requires the ongoing reform of both tariff and non-tariff barriers to trade. Non-tariff barriers remain an impediment to the international trade of grain and any trade agreement with Thailand must include a focus on the development and implementation of a systematic approach to addressing any barriers.

The SECA will potentially boost opportunities for the Australian grain industry and support growth, development and trade opportunities for Thailand's food manufacturing, stockfeed, aquaculture and livestock sectors.

3.0 Thailand – an opportunity for the Australian grain industry

Thailand is a diverse market and over the last few decades its economic growth and urbanisation has driven demand for grain and grain products. It is a significant and influential regional player, with the USDA March 2023 GAIN report forecasting 2023/24 wheat imports to increase to 2.7 million metric tonnes (MMT), 17 percent higher than MY2022/23. Milling wheat imports are also expected to be 1.3 MMT, up 18 percent from 2022/23 as flour mills actively import wheat (despite facing high import prices and feed wheat imports) and to increase to 1.4 MMT, up 40 percent from the previous year due to an anticipated recovery in swine production and growing export demand for poultry meat and products.

Thailand's projected population growth supports increased food demand, with overall food demand expected to grow. The Thailand Feed Mill Association (TFMA) expects total feed demand to increase to 19.9 MMT in 2023 up 5 percent from the prior year. This will largely be driven by an increase in poultry and the swine herd.

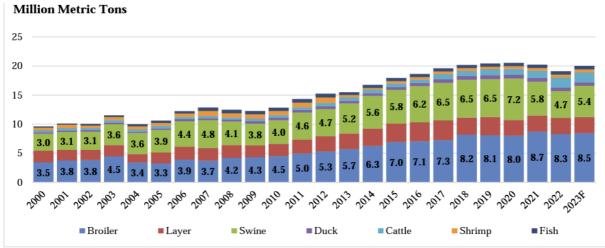


Figure 1: Thailand Feed Consumption Demand

Source: Thai Feed Mill Association

Thailand's agriculture sector has protections in place through government guidelines for the process of goods. In Agriculture this may include government subsidies for fertiliser and guaranteed minimum prices for grain. The Commerce Ministry also requires importers of wheat and other feed grains to adhere to a feed production ratio of 1:3 imported product to Thailand maize.

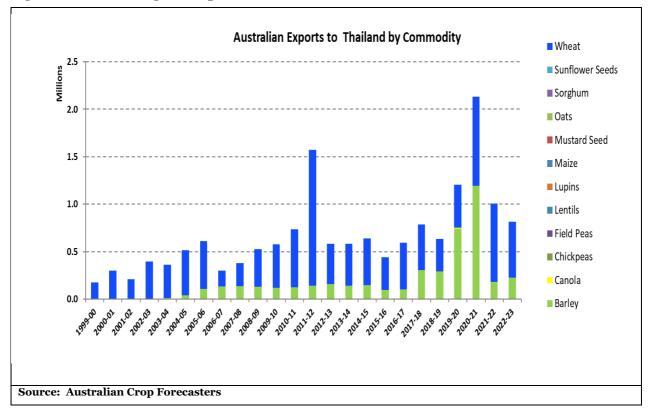
It has been reported in the March 2023 GAIN report the Thailand government is likely to maintain import restrictions on feed wheat, which require feed mills to purchase domestic corn at a guaranteed floor price

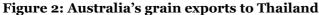
before importing feed wheat. The import restrictions on feed wheat will keep domestic corn prices high and drive import demand for corn from neighbouring countries, particularly from Burma and Cambodia.

In a recent Bangkok Post <u>article</u> these price control mechanisms were termed outdated and the vicechairman of the Employers' Confederation of Thai Trade and Industry urged the government to let supply and demand determine market prices.

4.0 Australia's grain industry trade with Thailand

The dominant exports of Australian grain to Thailand are wheat and barley. Thailand is the 9th largest importer of Australian grains, 4th largest importer of Australian barley and 9th largest importer of Australian wheat.





5.0 Thailand Non-Tariff Measures (NTMs)

In 2017, with funding support from the Department of Agriculture, Water & Environment (DAWE), the grain sector undertook a major study to identify commercially significant non-tariff barriers or measures (NTMs) for the grain industry. This report was pivotal in establishing a baseline for NTMs impacting the grain industry and the industry continues to work closely with DAFF and DFAT to identify and address NTMs.

Thailand agriculture is governed at the national level and controlled by the Ministry of Agriculture and Cooperatives. Policies are set at the national level and then implemented in local areas through regional offices or research extensions of the Ministry of Agriculture and Co-operatives.

In a recent University of Melbourne Asialink <u>publication</u> the Thailand government is described as seeking farmer's votes through price interventions and policies that directly or indirectly purchase farm produce at inflated prices. These interventions combined with NTMs hinder and distort trade.

The impact of NTMs include no/restricted market access, distorted supply/demand balances, uncertainty, risk and compliance costs. Notable NTMs include:

• *MSP* – Thailand has long established policies of guaranteed minimum support prices (MSP) received by farmers for their grain.

- *Import Restrictions* the Thailand Government employs import restrictions on feed grain in order to protect domestic corn growers from cheaper feed substitutes. From 2017, the feed import regulation requires importers to demonstrate a 3 to 1 domestic corn usage rate to imported feed substitutes.
- **Sanitary and phytosanitary (SPS) issues** These are often treated inconsistently, without transparency, and exhibit some political focus as compared to science-based decisions. Thailand does not have an import tolerance process, rarely update their list of chemical maximum residue limits (MRLs) and can diverge from internationally accepted standards when setting food safety parameters.

8.0 Conclusion

GTA believes the opportunity for a comprehensive trade agreement between Thailand and Australia offers significant potential benefits for both countries, notably in the agricultural and grain sectors. We believe strongly that grain must be included with meaningful outcomes in any credible agreement that delivers benefits for both countries.

Thailand, whilst an existing and important market for Australian grain will benefit from a credible agreement and encourage both countries to commit to an objective science and risk-based approach to trade and biosecurity, and to develop an agreed framework, including regular formal high-level (Ministerial) dialogue to facilitate this.

In terms of meaningful market access outcomes, we encourage the Australian Government to continue its work to remove impediments such as NTMs to free market access for Australian grains.

We believe there are realistic opportunities for the Australian Government to support a collaborative approach to improving skills, capability and understanding of our respective grain industries in support of growth in trade.

We thank you for the opportunity to make this submission. We request that you keep us updated on developments and progress in this important relationship and negotiation.

Please do not hesitate to contact GTA should you have any queries or should we be able to be of assistance.

Yours faithfully,

OS

Pat O'Shannassy CEO, Grain Grade Australia

GRAIN TRADE AUSTRALIA

Membership List as of 18 April 2023

 Organisation
 Contact

 Ordinary Member (Trading)

 Level A1 (over 7 Million Tonnes)

 CBH Grain Pty Ltd
 Mr Jason Craig

 Viterra Australia Pty Ltd
 Mr Philip Hughes

 Graincorp Operations Ltd
 Mr Robert Spurway

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

Level A4 (1.5 - 3 Million Tonnes) ADM Trading Australia Pty Ltd

Level B1 (1.0 - 1.5 Million Tonnes) Emerald Grain Pty Limited Manildra Group Arrow Commodities Pty Ltd Bunge Agribusiness Australia Pty Ltd CHS Broadbent Pty Ltd

Level B2 (500,000 - 1 Million Tonnes)

Riordan Grain Services

Australian Grain Export Pty Ltd Centre State Exports Pty Ltd Cofco International George Weston Foods Limited Inghams Enterprises Pty Ltd Ridley Agriproducts Pty Ltd Riverina (Australia) Pty Ltd ETG Commodities Pty Ltd

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

Allied Pinnacle Pty Ltd Robinson Grain Trading Co Pty Ltd Wilmar Gavilon Pty Ltd Louis Dreyfus Company Australia 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 Ptv 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 Ptv Ltd **Blairs Produce Company** Castlegate James Australasia Pty Ltd Coprice Darwalla Milling Co Pty Ltd Deckert Group Pty Ltd DDT Holdings Pty Ltd Esperance Quality Grains Hanlon Enterprises Grain Hazeldenes Chicken Farm Pty Ltd HX Food Group (Aus) Pty Ltd Independent Grain Handlers Pty Ltd Irwin Stockfeeds

Mr Zsolt Kocza

Mr Darryl Borlase

Mr David Johnson Mr Peter Sloan Mr Dominic Vanzella Mr Stephen Bennett Mr Steve Broadbent Mr Mark Lewis

Mr Brett Dodson Mr Jeff Voigt Ms Sara Pan Mr Mark O'Brien Mr Matt Clarke Mr Michael Reeves Mr Gareth Stapleton Mr Peter McMeekin

Mr Brett Duczmal Mr Gary Robinson Mr Matt Albion Mr Oliver Reid Mr Robin Cassar Mr Michael Aikman Mr Stuart Tighe Mr Kurt Wilkinson Mr Matt Kelly Mr David Oates/Barry Mansfield

Mr Ian Mack Mr Joe Hallman Mr Brett Stevenson Mr Michael Brittain Mr Bhuyan Gandhi Mr Peter Webb Ms Jill Smith Mr Shane Bird Mr Sean Blair Mr Ross Giovanetti Ms Krissy Campbell Mr Gary Heidenreich Mr Chris Deckert Mr Rajeev Saraff Mr Neil Wandel Mr Chris Coates Mr Marcus Dingle Mr Dong Zhao Mr Brad Bryant Mr Bryan Irwin

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Website /Phone

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Itochu Australia Ltd Inari Australia Pty Ltd J K International Pty Ltd Rex James Stockfeed Pty Ltd Jerilderie Grain Storage & Handling Laucke Flour Mills P/L Lawson Grains Ptv Ltd LDC Enterprises Australia Pty Ltd LINX Cargo Care LPC Trading Pty Ltd Malteurop Australia Pty Ltd Mandala Trading Pty Ltd MC Croker Pty Limited MSM Milling Pty Ltd Namoi Cotton Ltd Premium Grain Handlers P/L **Ouattro Ports** Reid Stockfeeds Ptv Ltd Rivalea (Australia) Pty Ltd - Animal Nutrition SunPork Farms Feed Mills ThriveAgri TSS Grain (Tasmanian Stockfeed Services) Unigrain Ptv Ltd W B Hunter Pty Ltd Wilken Grain Woods Grain Pty Ltd XLD Commodities Yenda Prods Grain Pty Ltd Viridis Ag

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

A T Waterfield & Son Ptv Ltd A W Vater and Co Advantage Grain Pty Ltd Access Grain 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 Ptv Ltd Coorow Seeds Cory Johnston (Aust) Pty Ltd Craig Tyack Grain Trading Deacon Seeds Company Defiance Maize Products Pty Ltd Direct Grain Ptv Ltd Direct Commodities Pty Ltd East Coast Stockfeed Ptv Ltd Ellerslie Free Range Farms Pty Ltd ETG Processing Pty Ltd T/A Wimpak Export Import Australia Ptv Ltd Export Trading Group Australia Pty Ltd Fanmac Logisitics Pty Ltd Feed Central Pty Ltd Findlays Barellan Forest Enterprises Development & Consulting Pty Ltd Grenfell Commodities Ptv Ltd GO Resources Pty Ltd

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Mr Brad Waterfield Mr Kim Vater Mr Chris Nikolaou Mr Wade Humphreys Mr Richard Alcorn Mr Kishore Bulchandani Mr Francois Darcas Mr Rajni Patel Mr Mick Connolly Mr James Hunt Mr Matt Bailey Mr Tom Lucas Mr Damien White Ms Julie Bartlett Mr Richard Baker Mr Jon Bucknall Mr Charles Coventry Mr Craig Scholz Mr Andrew Tremlett Mr Andrew Kluck Mr John Carson Mr Richard Black Mr Robert Lean Mr Brian Pover Mr Justin Fav Mr Craig Tyack Mr Mark Schmidt Mr Rodney Walker Mr Mark Davis Mr Hamish Robertson Mr Stuart Dolden Mr Bruce Holden Mr James French Mr Dhanesh Kumar Mr Shayne Clark Mr Chris Fanning Mr Tim Ford Mr Neil Findlay Mr Charles Lowe Mr Glenn Beasley Ms Rosemary Richards

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Godde's Grain & Fertiliser Pty Ltd Gold Star International Pty Ltd Grain Link (NSW) Pty Ltd Grain Link WA Pty Ltd Grainforce Ptv Ltd GrainTrend Pty Ltd GV Grain & Fodder Hartree Partners (Australia) Pty Ltd Harwood Grains Ptv Ltd J W Koek & Company KB Agri Services Pty Ltd Kangaroo Island Pure Grain Pty Ltd Kennett Rural Services Pty Ltd Lachlan Commodities Pty Ltd Lake Grain Pty Ltd Lane Grain Ptv Ltd Laragon Almond Processors Pty Ltd Marina Commodities McKenzie Ag Services McNaughts Grains & Fertilizer Pty Ltd Matthews Transport and Grain Traders Max Grains Pty Ltd Melaluka Trading Pty Ltd Mellco Pty Ltd Nandaly Grain Co-Operative Ltd Network Grains Pty Ltd Origin Grain Pty Ltd Outlook Commodities Pty Ltd Pacific Global Sprouts Pty Ltd Parkinson Bros PB Seeds Ptv Ltd Pearson's Grain Pty Ltd Peters Commodities Pty Ltd Pinnacle Grains Pty Ltd Plum Grove Pty Ltd Pure Foods Eggs Pty Ltd QS Commodities Pty Ltd Quirindi Grain & Produce RP Grain Ptv Ltd Rural Logic (Aust) Pty Ltd Shannon Bros Bulk Storage Pty Ltd Silo Bag Grain (NSW QLD) Pty Ltd Societa Cofica Pty Ltd Southern Cross Agricultural Exports P/L Spagricon Australia Pty Limited Standard Commodities Australia Pty Ltd Sudima Australia Ptv Ltd Southern Grain Pty Ltd Southern Grain Storage Pty Ltd Swiss Singapore (Australia) Pty Ltd Tamma Grains Australia Pty Ltd Targray Australia Pty Ltd Tiller Commodities Ptv Ltd TRC International Pty Ltd Ulusov Asia Pacific Universal Commodity Management Ward McKenzie Pty Ltd Watson's Bulk Logistics WHG Oceania Pty Ltd Wirrinourt Transport & Trading WW Agri Pty Ltd ZTC Australia

Transport Operator

Crawfords Freightlines Pty Lts Gehrke Grains and Transport 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 Perkins Commodity Brokers Pure Grain Network Pty ltd Quest Commodities Pty Ltd

Sole Operator

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

Corporate

Large ASX Limited Australia And New Zealand Banking Group Australian Grain Technologies Pty Ltd Barrett Burston Malting Co Pty Ltd Boortmalt Asia Pacific Pty Ltd Commonwealth Bank of Australia National Australia Bank Ltd NSW Ports

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 Qube Logistics (SB) Pty Ltd (T/A Qube Agri)

Small

Advance Trading Australasia Ag Scientia Pty Ltd Agvise (WA) Pty Ltd Aperture Ag Pty Ltd Basis Commodities Pty Ltd BSM Global Pty Ltd Clear Grain Exchange CloudBreak Grain Marketing Pty Ltd Delta Agribusiness Ptv Ltd EP Integrated Commodities Pty Ltd Farmanco Marketing Pty Ltd FarMarCo Australia Pty Ltd Finesse Solutions Pty Limited Flexi Grain Futari Holding Pty Ltd Goldstar Commodities Graintec Scientific Pty Ltd Grainx Guud Asset Cerium Pty Ltd HarvestCheck Pty Ltd Hay Plains Grain Storage Pty Ltd

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- Mr Adam Clarke Mr Angus Wettenhall Mr Robert Luetolf Mr Matt Henke Mr Todd Lees Mr Ian Mallon Mr Hamish Steele-Park
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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

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 Terry Deacon Mr Ole Houe Mr Rob Martin Mr Nick Carracher Ms Kareen Durr Mr Mark Martin Mr Gerard McMullen Mr Daniel Marsh Mr Adam Davies 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

Mr Paul Schweitzer

Mr Richard Simonaitis D. McKeon Mr Peter Nash Mr Colin Bettles Mr Peter Arkle

Ms Marie Cunningham Mr Colin Peace Ms Joanne Ware Mr John Francis

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Awarded 1998 Awarded July 2015 Awarded July 2016 Awarded August 2019