

## Submission

### Grain Trade Australia

### National Transport Regulatory Reform

July 2019

#### Version Control

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## **Inquiry into National Transport Regulatory Reform**

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## 1.0 Introduction

Grain Trade Australia (GTA) welcomes the Council of Australian Governments (COAG) commitment to a broad reform agenda in the transport regulatory sector with the stated objectives of:

- boosting productivity;
- increasing workforce participation and geographic mobility; and
- delivering better services for community.

Of great importance to the agricultural industry and the grain sector is the targeting of overlapping and inconsistent national, State and Territory regulations.

The Australian agricultural industry, and the 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. GTA firmly believes that an effective and efficient supply chain is critical to maintaining and growing productivity and profitability in the sector. GTA is committed to assisting and providing input to COAG and the Productivity Commission to achieve its stated objectives.

## 2.0 Grain Trade Australia's Role

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 is non-political, industry driven with a primary focus to ensure the efficient facilitation of commercial activities across the grain supply chain including a strong focus on the logistics of grain through transport storage and ports.

GTA's has over 270 organisations as members ranging from regional family businesses to large national and international trading, storage and handling companies, grain marketers, consumers and processors. The vast majority of grain contracts executed in Australia refer to GTA grain trading standards, standard-form grain contracts and GTA Trade Rules. Most of Australia's grain storage and freight movements are made by GTA members. Key National and State producer representative groups are also GTA Members. A full list of GTA Members is attached.

## 3.0 Grain Industry Sector

The Australian grains sector has been a consistent provider of productivity increases to the Australian economy with the Australian Bureau of Agricultural Research and Economics (ABARES) stating that [in the 20-years to 2017-18 crop production increased by 18% and the value of exports increased by 36%] in 2017-18, the gross value of crop production is set to increase to \$28.6 billion. With 60% of production exported the industry is a major driver of export revenue, in 2017/18 the Australian grain industry value was around \$13.8 billion (farm gate value) and \$10.8 billion of exports. The grain industry, and its ancillary suppliers and service providers, are a substantial employer of people from farm gate through to port.

The grain industry supply chain is geographically diverse and is spread across 18 ports in the 5 major producing states of the nation.

Producing on average 45mmt tonnes from approximately 21,000 farms production units<sup>1</sup> 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.

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 on-farm storage, with a recent Rabobank [analytical paper](#) reporting approximately 17mmt of farm storage available to the industry.
- Rationalisation of bulk handler receival sites and service arrangements.
- 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 export tonnage due to favourable back freight opportunities combined with international markets 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.

The increased complexity in the grain supply chain has created challenges and constraints in peak periods. This evolving model and its complexity need to be understood and factored into the governments Reform agenda.

## 4.0 Information Requests

The following responses are provided to questions (that are relevant to GTA) in the Productivity Commission Information Request in the National Transport Regulatory Reform Issues Paper.

### 4.1 Regulatory Frameworks

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#### INFORMATION REQUEST

*"The regulatory frameworks differ across modes and consequently the three regulators operate in different ways — for example, the rail model is co-regulatory.*

- *What are the practical effects of co-regulatory versus non-co-regulatory regimes?*
- *If you work with more than one of the national regulators, what are the strengths and weaknesses of the different approaches?"*

#### **GTA Response:**

GTA does not have access to empirical data on which to provide a detailed answer to these questions. However, GTA based on subjective and anecdotal feedback and comments supports that the co-regulatory

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<sup>1</sup> Grain Growers – State of the Industry 2016  
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Rail model appears to deliver reform at a slower pace than the non-core regulatory regimes. This may be a result of both the history of the state-based networks and current structure within the rail industry.

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#### INFORMATION REQUEST

*Differences in the regulatory frameworks are also apparent in the degree to which the national laws are prescriptive or more risk-management based.*

- *What are the practical effects of prescriptive versus risk-management-based approaches?*
- *If you work with more than one of the national regulators, what are the strengths and weaknesses of their different approaches to regulation?*

*To what extent are the differences in regulatory frameworks between modes justified, for example, by the size and number of operators in the markets, nature of businesses being regulated, or the technical nature of the activity being regulated?*

#### **GTA Response:**

It would appear the current prescriptive versus a risk-based assessment approach have both been effective when aligned correctly to the size and number of operators in each of the markets. It is GTA's view the NHVR's initial prescriptive approach which now also includes (with the recent change to the HVNL) a risk-based approach is becoming more effective across the diverse portfolio of supply chain participants in this sector.

The initial wholly prescriptive approach by the NHVR was supportive of a relatively smooth implementation of the HVNL, especially with the larger organisations within the road transport sector. With the evolution to a risk-based approach the NHVR is addressing adoption by both smaller entities within the road sector as well as other participants within the supply chain.

## **4.2 Other Reviews**

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#### INFORMATION REQUESTS/QUESTIONS

*In light of the other reviews relating to heavy vehicles where do you think the Commission could best add value to the policy and reform agenda?*

*Are there any other reviews that the Commission should be aware of?*

*What other relevant research on the net benefits of transport reform should the Commission draw on?*

#### **GTA Response:**

Alignment with the National Freight and Supply Chain Strategy and any other national planning reforms is logical. This could be combined with consideration of the role intermodal transport plays and how planning and reform applies to it.

## **4.3 Safety Outcomes**

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**INFORMATION REQUEST**

*What impact have the national reforms had on safety outcomes?*

*What impact have other contributors to safety outcomes had since the reforms were introduced?*

*What impacts do contracting practices and competitive pressures have on safety outcomes?  
How might these be addressed?*

*Have any compromises involved in the creation of the national law impacted safety outcomes?  
Do the national laws reflect best practice safety regulation?*

*What are the best measures of safety in rail, road and maritime? Where can the Commission source such data?*

*What changes, if any, to the current system would improve safety outcomes?*

*What have been the costs, or unintended consequences, of moving towards uniform national standards?*

*How does transport safety regulation interact with other regulatory schemes, for example, workplace health and safety regulation? Where is there a conflict, what issues arise as a result?  
How should this conflict be addressed?*

**GTA Response:**

As there can be substantial trade and movement of grain across State boundaries, GTA supports a co-ordinated and consistent regulatory and legislative approach. Overall the introduction of the national reforms has been positive in relation to safety outcomes and in particular in the road sector.

There is a heightened awareness of safety in the grain supply chain as a result of national reforms. It is considered further improvement can be attained through greater harmonisation of State and Territory regulators with the national model. Similarly, a key area of harmonisation and a necessary part of the reform is to establish national measures of safety in rail, road and maritime that are aligned to productivity measures to allow tracking of the success of initiatives implemented.

Whilst GTA strongly supports the objective to remove overlapping and inconsistent national, State and Territory regulations these reforms have, and will continue to create complexity and additional cost for industry in understanding and introducing the scheme/s and the ongoing management and maintenance of individual organisation compliance. Of particular concern is the promulgation of information including updates and changes in legislation to the road sector. Given the number and the breadth of organisations that are either involved in the provision of service or as a coordinator and user of services this is a large undertaking.

The grain industry has accepted the challenge to focus on transport safety outcomes ahead of competitive pressure having established a Grain Industry Code of Practice and supporting Grain Transport Code of Practice. Similarly, contracts and the logistical planning processes in the grain supply chain have evolved as a result of the national reforms.

To further support the Code and the grain industry GTA has also established a hands-on practical training program for both GTA members and non-members in the steps to be compliant with Chain of Responsibility. This was supported through a grant received through the HVNL safety initiative.

#### 4.4 Inconsistencies across States and Territories

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##### INFORMATION REQUEST

*What have been the practical effects, particularly on safety, regulatory burden, costs and productivity, of:*

- States and Territories not participating in the national approaches? For example, has non-participation by Western Australia and the Northern Territory caused complications for industry?*
- variations between States and Territories in the time taken to pass legislation to apply a law or make amendments? For example, does interstate variation in the speed with which amendments take effect have an impact on operators?*
- State and Territory government exemptions from the national laws? For example, does the grandfathering from survey of some vessels have any safety implications?*

*Should any inconsistencies in the current system be addressed? If so, what are these and how should they be addressed?*

##### **GTA Response:**

###### **Rail:**

Australia's rail supply chain transport infrastructure and its operation has suffered the adverse effects of inconsistencies between different State and Territory jurisdictionally based decision making. Historically, there is a relatively small annual tonnage that moves interstate by rail. However, on the occasions (such as when regional droughts occur) when demand for interstate movements occur the industry is required to deal with a lack of harmonisation of standards and multiple interfaces between different state systems.

###### **Road:**

The impact of the non-participation by Western Australia and the Northern Territory has not caused any major complications for GTA members.

#### 4.5 Regulatory Burden and Cost

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##### INFORMATION REQUEST

*How has the move to a national regulatory system affected operators' regulatory burden and compliance costs?*

*How has the move to a national regulatory system affected the costs to government of administering transport safety regulation?*

*How might the costs and benefits of any changes in regulatory burden, and any changes in compliance or administrative costs best be measured? Where can the Commission source relevant data?*

*How might any unnecessary regulatory burden and compliance or administrative costs be reduced?*

##### **GTA Response:**

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GTA agrees with the principle that costs should be lower if the intent of the IGAs and COAG's broader agenda is realised.

It should be noted the shift of some regulatory services to a cost recovery model should always be considered carefully as implementation may have adverse impacts on some industry sectors.

#### **4.6 Has Productivity and Efficiency Improved?**

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##### *INFORMATION REQUEST*

*Is the Commission's understanding of heavy vehicle productivity accurate?*

*How can heavy vehicle productivity be best measured?*

*Have there been changes to heavy vehicle productivity since the national reforms were implemented? If yes, how did the reforms contribute relative to other productivity drivers?*

*What has been the cost of implementing the heavy vehicle productivity reforms for government and operators?*

*Where can the Commission source data relevant to the above lines of inquiry?*

*If the relevant reforms have improved safety, has this led to productivity benefits for operators? If so, how do these manifest and how can they be measured?*

*What other effects, if any, have the reforms had on the productivity and efficiency of the transport industry? What are the main drivers of any such effects?*

*What changes to the current system could improve productivity outcomes?*

*Should the remit of ONRSR and AMSA be expanded to include productivity objectives or should this be the responsibility of other institutions and agents?*

##### **GTA Response:**

GTA does not have the relevant data to accurately answer questions relating to productivity and efficiency.

It is recommended that the collection of analytical data and the research to answer the questions posed should be a high priority for COAG to ensure effective decisions are made.

Similarly, any decision to expand ONRSR and AMSA to include productivity objectives cannot be considered without reference to data and research to support decisions and direction.

#### **4.7 Indirect Benefits**

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##### *INFORMATION REQUEST*

*What, if any, indirect benefits have flown from the reforms to industries that interact with the transport industry, governments and the broader community? For example, have any cost savings been realised?*

*What data and tools should the Commission draw on to estimate any indirect net benefits?*

*Has the creation of a national system made it easier to change regulation?*



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*INFORMATION REQUEST*

*Has the creation of a national system had any effects on other areas of regulatory effort, for example, on the residual functions retained by States and Territories?*

**GTA Response:**

The measurement of indirect benefits is outside the capability of GTA. However, in principle the creation of a national system should make it easier to change regulation.

#### **4.8 Regulators Performance & Implementation**

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*INFORMATION REQUEST*

*Are the regulators effective? Are they adequately resourced? Do they have appropriate powers to achieve their objectives?*

*Where regulatory arrangements are not operating as expected, what are the reasons? For example, are there issues with the regulatory structure or with government policies? How might any issues best be addressed?*

*Are current accountability arrangements for the national regulators effective? If not, why not and how might they be improved?*

**GTA Response:**

Government departments, agencies and councils all have a role in regulatory arrangements. Given the breadth of participants it is likely there are inconsistencies amongst capabilities, application and how they are resourced and the appropriate powers each has.

Whilst, GTA has not reviewed available statistical measures in enough detail to be able to comment on the each regulator's performance it would appear from the NTC progress report to the Transport and Infrastructure Council on the implementation status of nationally agreed reforms that further improvements can be made.

As part of ongoing improvement, GTA recommends that priority and weighting should be given to the principles of 'effective collaboration' and the 'effective engagement of stakeholders' as these are considered critical to the effectiveness of the regulators.

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*INFORMATION REQUEST*

*What kinds of implementation issues are still to be resolved?*

*Have there been any limitations on the national regulators arising from the original COAG negotiations? Grandfathering arrangements or service level agreements might be examples. Are these limitations still in force? If so, are they still appropriate?*

*What if anything, needs to be done to address any outstanding implementation issues?*

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**GTA Response:**

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The implementation process is obviously complex and requires due care. However, the process of reform from an external perspective has appeared slow and constrained. This view may reflect a lack of engagement with industry during a complex process or may be symptomatic of other issues including a lack of resourcing. Government transport sector employees in federal and state governments and councils may not have the level of skills and funding to support the changes.

GTA Members have raised concerns on numerous occasions of the frustration of dealing with the many layers of compliance in the road sector, especially at the local council level. Council bylaws can restrict and inhibit the effectiveness of the road sector due to variation in individual council permit systems for heavy vehicle configurations.

The growth in on-farm grain storage results in a greater percentage of export and domestic consignments commencing from the farm. As a result, there is increasing demand for permits.

## **5.0 Further Opportunities to improve Safety and Productivity**

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.

However, current depressed sea freight rates and increasing competition from the Black Sea region has dramatically reduced the inherent competitive advantage afforded to Australian grain.

GTA in 2014 provided a Submission to the Agricultural Competitiveness White Paper. This paper ([GTA Submission to Ag White Paper](#)) provides some detail on the competitiveness of the Australian transport, infrastructure and the grains sector.

Supply chain related innovation is essential and requires leadership, planning and capital investment to ensure a safe and efficient globally competitive grain industry for Australia

### **High transport costs damage the competitiveness of Australian grains in world markets.**

The recent review of governance and institutional arrangements in the area of Coastal Shipping was welcomed by GTA, as it is felt this may reduce cost and improve efficiency for the grains industry. Similarly, GTA provided a submission ([GTA Submission to National Freight and Supply Chain Strategy](#)) and support the principle of the National Freight and Supply Chain Strategy. In its submission GTA highlighted particular issues and areas GTA would like the Inquiry to be aware of and considered. Some of these also apply to and should be considered in this ongoing reform process. These are:

### **5.1 Inclusive and detailed approach**

Government and industry supply chain planning processes and supporting analytical data are critical to the formulation of policy and the introduction of reform. GTA considers any reform requires a strong focus on inclusive community consultation. This is especially the case, given the potential impact any changes in government policy may have on rural industry and communities.

### **5.2 Introduction and utilisation of consistent analysis**

When planning, governments across Australia utilise 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 reform activities and will help to ensure a standardised method. The methodology should include social and environmental impacts as well as pure economic value.

### **5.3 Effective leadership structures**

Structural reform and change require strong leadership from all levels of government. Government should be supported in this process by strong industry representation from each relevant sector. Achieving alignment of Government and industry on reform initiatives is of benefit and will speed uptake and implementation.

## **6.0 Conclusion**

GTA welcome the opportunity to provide input into the National Transport Regulatory Reform inquiry and is committed supporting the reform process and especially the targeting of overlapping and inconsistent national, State and Territory regulations.

Please keep GTA informed of further opportunities to assist with shaping the outcome of the reform as it is considered important to assist the grains industry to continue to provide economic value to the nation.

## Membership List as at 07 June 2019

Organisation	Contact	Website /Phone
<b>Ordinary Member (Trading)</b>		
<b>Level A1 (over 7 Million Tonnes)</b>		
CBH Grain Pty Ltd	Mr Jason Craig	cbh.com.au
Glencore Agriculture Pty Ltd	Mr Philip Hughes	glencoreagriculture.com.au
		2
<b>Level A2 (5 - 7 Million Tonnes)</b>		
Graincorp Operations Ltd	Mr Klaus Pamminger	graincorp.com.au
		1
<b>Level A3 (3 - 5 Million Tonnes)</b>		
ADM Trading Australia Pty Ltd	Mr Darryl Borlase	adm.com
Cargill Australia Limited	Ms Penne Kehl	cargill.com.au
		2
<b>Level A4 (1.5 - 3 Million Tonnes)</b>		
Bunge Agribusiness Australia Pty Ltd	Mr Stephen Bennett	bunge.com/Agribusiness
Cofco International	Mr Yebin Li	cofcoagri.com.au
Emerald Grain Pty Limited	Mr David Johnson	emeraldgrain.com
Plum Grove Pty Ltd	Mr Tony Smith	plumgrove.com.au
		4
<b>Level B1 (1.0 - 1.5 Million Tonnes)</b>		
Arrow Commodities Pty Ltd	Mr Dominic Vanzella	arrowcom.com.au
Louis Dreyfus Company Australia Pty Ltd	Mr Robert Green	louisdreyfus.com.au
		2
<b>Level B2 (500,000 - 1 Million Tonnes)</b>		
Australian Grain Export Pty Ltd	Mr Brett Dodson	australiangrainexport.com.au
CHS Broadbent Pty Ltd	Mr Justin Fay	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
		7
<b>Level B3 (250,000 - 500,000 Tonnes)</b>		
Agfarm Pty Ltd	Mr Ron McCalman	agfarm.com.au
Agracom Pty Ltd	Mr Joe Hallman	agracom.com.au
AGRIGRAIN	Mr Jeremy Brown	agrigrain.com
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
United World Enterprises Pty Ltd	Mr Jimmy Liu	uwetypical.com
Wilmar Gavlion Pty Ltd	Mr Matt Albion	07 3713 8700
		10

## Ordinary Member (Trading) (contd)

### 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
Agromin Australia Pty Limited	Mr Rajni Patel	agromin.com.au
AGT Foods Australia	Mr Peter Wilson	agtfoods.com/australia
AMPS Agribusiness Group	Mr Simon McDougall	ampsagribusiness.com.au
Associated Grain	Mr Todd Jorgensen	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
Berriwillock Grain Storage Co-Operative Ltd	Mr Tony Bellinger	moulameingrain.com
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
Cleveland Agriculture	Mr Chris Hurwood	02 6756 5004
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
Dalgrains (Qld) Pty Ltd	Mr Tobin Cherry	dalgrains.com
Darwalla Milling Co Pty Ltd	Mr Gary Heidenreich	07 3822 0527
Deacon Seeds Company	Mr Terry Deacon	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
ED & F Man Grains Australia	Mr Oliver Reid	edfman.com
East Coast Stockfeed Pty Ltd	Mr Stuart Dolden	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.

Fellows Nominees	Mr Paul Fellows	<a href="http://fellowsbulk.com.au">fellowsbulk.com.au</a>
Fertinvest Australia Pty Ltd	Mr Greg Sandral	<a href="http://fertinvest.com">fertinvest.com</a>
Findlays Barellan	Mr Neil Findlay	02 6963 9246
Five Star Stock Feeds	Mr Tim Huggins	<a href="http://fssf.com.au">fssf.com.au</a>
Fletcher International Exports Pty Ltd	Mr Kurt Wilkinson	<a href="http://fletchint.com.au">fletchint.com.au</a>
GO Resources Pty Ltd	Ms Rosemary Richards	<a href="http://go-resources.com.au">go-resources.com.au</a>
Golden Harvest Grain Exports	Mr Chandru Hiremath	<a href="http://goldenharvest.net.au">goldenharvest.net.au</a>
Gold Star International Pty Ltd	Abhishek Kotkar	<a href="http://goldstarinternational.com.au">goldstarinternational.com.au</a>
Grain Direct Australia	Mr Chris Kochanski	<a href="http://graindirect.com.au">graindirect.com.au</a>
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Grainpro Pty Limited	Ms Angela Bonfante	<a href="http://grainpro.com.au">grainpro.com.au</a>
GrainTrend Pty Ltd	Mr Sanjiv Dubey	<a href="http://graintrend.com">graintrend.com</a>
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GV Grain & Fodder	Ms Joanne Harry	03 5828 3063
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Independent Grain Handlers Pty Ltd	Mr Brad Bryant	<a href="http://igh.net.au">igh.net.au</a>
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Itochu Australia Ltd	Mr Justin Swan	<a href="http://www.itochu.com.au">www.itochu.com.au</a>
J K International Pty Ltd	Mr Sandeep Mohan	<a href="http://jki.com.au">jki.com.au</a>
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Kangaroo Island Pure Grain Pty Ltd	Ms Emma Tonkin	<a href="http://kipuregrain.com">kipuregrain.com</a>
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Lake Grain Pty Ltd	Mr Derek Davis	<a href="http://lakegrain.com.au">lakegrain.com.au</a>
Lane Grain Pty Ltd	Mr Garry Lane	02 6887 3309
Laragon Almond Processors Pty Ltd	Mr Mark Webber	<a href="http://laragon.com.au">laragon.com.au</a>
Laucke Flour Mills P/L	Mr Roger Laubsch	<a href="http://laucke.com.au">laucke.com.au</a>
Lawson Grains Pty Ltd	Mr Angus Blair	<a href="http://lawsongrains.com">lawsongrains.com</a>
LDC Enterprises Australia Pty Ltd	Mr Richard Porter	07 3253 5999
LINX Cargo Care	Mr David Simpson	<a href="http://linxcc.com.au">linxcc.com.au</a>
LPC Trading Pty Ltd	Mr Simon Langfield	02 6383 7222
Mandala Trading Pty Ltd	Mr Jayjeev Saraff	<a href="http://mandalatrading.com.au">mandalatrading.com.au</a>
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	<a href="http://maxgrains.com.au">maxgrains.com.au</a>
MC Croker Pty Limited	Mr Greg Carroll	<a href="http://crokergrain.com.au">crokergrain.com.au</a>
McNaughts Grain & Fertilizer Pty Ltd	Mr Daniel McNaught	<a href="http://mcnaughts.com">mcnaughts.com</a>
Melaluka Trading Pty Ltd	Mr Simon Pritchard	<a href="http://melalukatrading.com.au">melalukatrading.com.au</a>
Mellco Pty Ltd	Mr Steve Mellington	0419 867 971
Moulamein Grain Co-Operative Ltd	Mr Tony Bellinger	<a href="http://moulameingrain.com">moulameingrain.com</a>
Moxey Farms Pty Limited	Ms Jill Smith	02 6344 8462
MSM Milling Pty Ltd	Mr Peter MacSmith	02 6364 5999
Murrumbidgee Grains Pty Ltd	Mr Peter Hassall	02 6937 9100
Namoi Cotton Ltd	Mr Shane McGregor	<a href="http://namoicotton.com.au">namoicotton.com.au</a>
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
Northern Riverina Grains Pty Ltd	Mr Jon Bucknall	02 9875 3919



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

OOMA Enterprises NSW Pty Limited	Mr Malcolm Berry	oomaenterprises.com.au
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
Quadra Commodities Pty Ltd	Mr Robin Cassar	quadra.com
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
Roty Grain Store	Mr Brian Newman	02 6988 8221
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
SANWA Pty Ltd	Mr Charles Emerson	sanwa.com.au
Seedhouse Tasmania	Mr Matthew Crane	seedhouse.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
Spring Market Trading Company	Mr Damien White	springmarket.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
Vivcourt Commodities	Mr Alex Low	vivcourtcommodities.com.au
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



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

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
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#### 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
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#### Broker

Large		0
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##### 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
Asiagrains Bulk Commodities Pty Ltd	Mr Michael Moss	0418 322 396
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
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#### 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
Merricks Capital Pty Limited	Mr Adam Davis	merrickscapital.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	tpports.com

## Corporate (cont.)

### Medium

Viridis Ag	Mr Anthony Howard	viridisag.com
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### 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 Simon Clancy	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
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 Dalgliesh	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

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## International Affiliate

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

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## Industry Association

Australia Export Grain Innovation Centre	Mr Richard Simonaitis	aegic.org.au
Grain Growers Limited	D. McKeon/M. Southan	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	Mr Robert Hardie	02 9478 1000
Victorian Farmers Federation	Mr Alister Boyd	03 9207 5555

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## Merchant Association

Grain Industry Association of SA	Ms Rebecca Freeman	0414 844 425
Grain Industry Association Of Victoria	Mr Colin Peace	giav.com.au
Grain NSW Inc	Ms Joanne Ware	grainnsw.com.au

Life Members

Mr Mervyn May

Awarded 1998

Mr Christopher Kelly  
Mr Geoff Honey

K M & W M Kelly & Sons

Awarded July 2015  
Awarded July 2016