

Grain Trade Australia Limited PO Box R1829 Royal Exchange NSW 1225 Phone: +61 2 9235 2155 Fax: +61 2 9235 0194

The Hon. Darren Chester MP Minister for Infrastructure and Transport Department of Infrastructure and Regional Development, GPO Box 594, CANBERRA, ACT 2601. Via Email: shipping@infrastructure.gov.au

24 April 2017

RE: COASTAL SHIPPING REFORMS

Dear Minister,

I am writing on behalf of Grain Trade Australia (GTA) in response to the call for submissions with respect to the Governments proposed Coastal Shipping Reforms.

1. About GTA

Grain Trade Australia (GTA) is the focal point for the commercial grains industry within Australia. It facilitates trade and works to provide an efficient, equitable and open trading environment by providing leadership, advocacy and commercial services to the Australian grain value chain. GTA members are responsible for over 95% of all grain storage and freight movements made each year in Australia. Over 95% of the grain contracts executed in Australia each year refer to GTA grain standards and/or trade rules. GTA members are drawn from all sectors of the grain value chain from production to domestic end users and exporters. GTA members are involved in grain trading activities, grain storage, human and stock feed milling. A list of GTA Members is attached

2. In-Principle positions:

GTA supports the in-principle positions of reducing the regulatory burden on Industry, providing regulatory certainty and simplification for business. GTA's perspective is that reducing the cost, complexity and burden of un-necessary regulation will help to facilitate trade, creating improved efficiency, reduced costs and economic value for supply chain participants. These participants include grain traders, logistics providers, ship owners and charterers, and ultimately and importantly grain farmers.

3. Proposed Reforms:

GTA supports reducing the regulatory burden on industry and is of the view that providing more access to coastal shipping may reduce costs and improve efficiency for the grains industry.

- GTA notes there can be efficiency in the supply chain for some movement of grain domestically to occur via sea freight rather than road or rail, particularly over long distances or cross coast movements.
- By making the domestic coastal shipment of grain more cost effective (due to lower regulatory burden and associated costs) the potential grain market price volatility in areas of grain production shortfall and relatively high domestic demand (such as East Coast Australia) may reduce. Reduced regulatory burden would also enable broader participation (from SA and WA) within the Australian economy for the market to determine the balance between supply and demand.
- Increased transportation of grain via ocean freight will also reduce road transport movements, acknowledging some road operator's may be impacted, but noting long haul freight is more efficient via sea and rail, meaning improved supply chain value overall.
- GTA specifically supports the use of ships at end of international voyage to be able to make a coastal voyage. It is expected this will help to facilitate better vessel utilisation for the shipping industry, to promote more competitive shipping rates not only for domestic orientated cargos, but if ship utilisation is improved, it should enable more competitive freight rates for the task of exporting Australia's grain (and other commodities) to the world.

In summary, GTA advocates for the reduction of regulatory oversight on industry given its cost, and burden having a consequence of inefficiency on the overall supply chain. GTA supports an environment of improved competition, reduced regulatory requirements and support Industry in its efforts to increase value to the supply chain, whilst maintaining its social licence to operate.

I would welcome consideration of the issues mentioned above. Please don't hesitate to contact me should you require further information.

Yours faithfully,

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Pat O'Shannassy CEO

Encl: List of GTA members

GRAIN TRADE AUSTRALIA

Membership List as at 03 February 2017

Organisation	Contact	Website /Phon
linary Member (Trading)		
Level A1 (over 7 Million Tonnes)		
Co-operative Bulk Handling Limited Glencore Grain Pty Ltd	Mr Jason Craig Mr Philip Hughes	cbh.com.a glencoregrain.com.a
Level A2 (5 - 7 Million Tonnes)		
Level A3 (3 - 5 Million Tonnes)		
ADM Trading Australia Pty Ltd	Mr Tim Henry	adm.co
Cargill Australia Limited	Ms Penne Kehl	cargill.com.a
Graincorp Operations Ltd	Mr Klaus Pamminger	graincorp.com.a
Level A4 (1.5 - 3 Million Tonnes)		
Emerald Grain Pty Limited	Mr David Johnson	emeraldgrain.co
Nidera Australia Pty Ltd	Mr David Lengren	nidera.com.a
Level B1 (1.0 - 1.5 Million Tonnes)		
Bunge Agribusiness Australia Pty Ltd	Mr Chris Aucote	bunge.com/Agribusine
Louis Dreyfus Company Australia Pty Ltd	Mr Robert Green	louisdreyfus.com.a
Level B2 (500,000 - 1 Million Tonnes)		
Agrex Australia Pty Ltd	Mr Richard Glasson	agrexaustralia.com.a
Broadbent CHS Pty Ltd	Mr Justin Fay	broadbentgrain.com.a
Cofco Agri Australia Pty Ltd	Mr Josh Taylor	au.cofcoagrigrain.co
George Weston Foods Limited	Mr Mark O'Brien	gwf.com.
Plum Grove Pty Ltd	Mr Tony Smith	plumgrove.com.
Ridley Agriproducts Pty Ltd	Mr Michael Reeves	agriproducts.com.
Riverina (Australia) Pty Ltd	Mr Jon Mulally	riverina.com.
Level B3 (250,000 - 500,000 Tonnes)		
Agracom Pty Ltd	Mr Joe Hallman	agracom.com.
AGRIGRAIN	Mr Jeremy Brown	agrigrain.co
Arrow Commodities Pty Ltd	Mr Dominic Vanzella	arrowcom.com.
Australian Grain Export Pty Ltd	Mr John Thiele	08 8832 280
Centre State Exports Pty Ltd	Mr Jeff Voigt	centrestateexports.com.
Chinatex Australia Pty Ltd	Mr Jiling Lai	02 9957 268
Lempriere Grain Pty Ltd	Mr Jonathan Holdsworth	lemprieregrain.com.
Riordan Grain Services	Mr Bradley Hogan	riordangrains.com.
Robinson Grain Trading Co Pty Ltd	Mr Gary Robinson	robinsongrain.com.
Special One Grain Accumulator	Ms Jaimee Carrigan	specialonegrain.com.
United World Enterprises Pty Ltd	Mr Jimmy Liu	uwetypical.co
Wilmar Gavilon Pty Ltd	Mr Matt Albion	07 3713 870

Ordinary Member (Trading) (contd)

Level C (under 250,000 Tonnes) A & B Grains Pty Ltd A T Waterfield & Son Pty Ltd A W Vater and Co 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** All Commodities Pty Ltd Allied Mills **AMPS Agribusiness Group Associated Grain** Auscott Ltd AusiCan Commodities Australian Choice Exports Pty Ltd Australian Grain Growers Co-operative Limited Australian Grain Storage Australian Growers Direct Pty Ltd Australian Mungbean Company Pty Ltd **Avigrain Produce Baker Grain** Berriwillock Grain Storage Co-Operative Ltd **BFB Pty Ltd Big River Feeds Pty Ltd Blairs Produce Company Blue Ribbon Seed and Pulse Exporters Boort Grain Co-Operative** Broun and Co Grain Pty Ltd **Bungulla Farming Pty Ltd** C & S Trading Pty Ltd C K Tremlett Pty Ltd **Cameron Pastoral Company Pty Ltd** Castlegate James Australasia Pty Ltd **Cleveland Agriculture Commex International Pty Ltd 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 Donnellons Bulk Haulage Pty Ltd ED & F Man Grains Australia East Coast Stockfeed Pty Ltd **Elders Grain** Export Trading Group Australia Pty Ltd Feed Central Pty Ltd

Mr Chris Wolski Mr Brad Waterfield Mr Kim Vater 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 Andrew Quillan Mr Simon Gelling Mr Simon McDougall Mr Todd Jorgensen Mr Peter Webb Mr Palwinder Singh Mr James Hunt Mr Bruce McDonald Mr Matt Bailey Mr Tom Lucas Mr Damien White Mr Dennis Ward Mr Richard Baker Mr Tony Bellinger Mr Terry Brabin Mr Bjorn Ludvigsen Mr Sean Blair Mr Stephen Donnelly Mr Tony Bellinger Mr Wal Broun Mr Brad Jones Mr Craig Scholz Mr Andrew Tremlett Mr Ross Stephens Mr Dominic Hogan Mr Chris Hurwood Ms Mariam Boulos Mr Brian Pover Ms Kirsty Cutter 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 Bill Donnellon Mr Jon Bucknall Mr Stuart Dolden Mr Matthew Tolmachoff Mr Shayne Clark

abgrains.com.au 03 5382 3725 vater.com.au adamsaustralia.com.au agmark.com.au agriom.com.au 03 9830 7021 02 9232 0690 agrifoodsaustralia.com.au agromin.com.au agtfoods.com/australia allcommodities.com.au alliedmills.com.au ampsagribusiness.com.au 07 4662 1999 auscott.com.au ausican.com australianchoiceexports.com.au aggcoop.com.au sunrice.com.au ausgrowersdirect.com.au australianmungbean.com.au avigrain.com.au bakergrain.com.au moulameingrain.com bfb.com.au 08 8532 4434 02 6025 4600 07 3363 8400 03 5455 2600 brounandco.com.au 08 9637 1164 scholzbh.com.au 08 8524 9050 07 4671 4144 castlegatejames.com.au 02 6756 5004 02 9531 7341 coorowseeds.com.au coprice.com.au cremer.com.au 07 4695 5777 dbrl.com.au dalgrains.com 07 3822 0527 07 4662 3217 deckerts.com.au corson.co.nz 08 6389 0098 0428 136 483 edfman.com ecsf.com.au elders.com.au etgworld.com feedcentral.com.au

Mr Tim Ford

Level C (under 250,000 Tonnes) cont.

Fellows Nominees FertInvest Pty Ltd **Findlays Barellan** Fletcher International Exports Pty Ltd **FREE Eyre Grain Pty Ltd Golden Harvest Grain Exports** 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 Iloura Resources Pty Ltd Independent Grain Handlers Pty Ltd **Irwin Stockfeeds** Itochu Australia Ltd J K International Pty 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 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 Mountain Industries Pty Ltd **Moxey Farms Pty Limited** MSM Milling Pty Ltd Murrumbidgee Grains Pty Ltd Namoi Cotton Co-Operative 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 Michael Jones Mr Neil Findlay Mr Kurt Wilkinson Mr Mark Rodda Mr Chandru Hiremath Mr Lyndon Benecke 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 Mr James Carson Mr Hans Hol 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 Simon Langfield Mr Jack King Mr Neville Matthews Mr Jack Fahy Mr Greg Carroll Mr Daniel McNaught Mr Simon Pritchard Mr Steve Mellington Mr Tony Bellinger Mr Bill Law Mr Peter Philipzen Mr Peter MacSmith Mr Peter Hassall Mr Shane McGregor Mr Tony Bellinger Mr Craig Dennis Mr Jock Carter Mr Tony Bellinger Mr Malcolm Berry

Level C (under 250,000 Tonnes) cont.

Origin Grain Pty Ltd Pallinup Logistics Pty Ltd 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** Rivalea (Australia) Pty Ltd - Animal Nutrition **Riverina Oils & BioEnergy Pty Ltd Roty Grain Store** 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 Ark Storage 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 Standard Commodities Australia Pty Ltd Sumitomo Australia Pty Ltd Summer Hill Grains Tasmanian Agricultural Producers Pty Ltd **TSS** Grain Thallon Grains Pty Ltd **Twynam Pastoral Company Unigrain Pty Ltd** Unique Grain Management Pty Ltd W B Hunter Pty Ltd Ward McKenzie Pty Ltd WHG Oceania Pty Ltd Whitty Produce Whyalla Beef Pty Ltd Wilken Grain Wimpak Pty Ltd XLD Grain Pty Ltd Yenda Prods Grain Pty Ltd

Transport Operator

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

Mr Peter Brick Kevin Imberti Mr Peter Blair Mr Shane Wall Mr Darren Pearson Mr Michael Oxley Mr Jogesh Virk Mr John Orr Mr Andrew Kell Ms Leanne Burr Mr Richard Black Mr Dene Ladmore Mr John Webster Mr Ian Reid **Mr Andrew Philpotts** Mr Lachlan Herbert Mr Brian Newman Mr Tim Ruddenklau Mr Michael Wood Mr Charles Emerson Mr Matthew Crane Mr Clayton Shannon Ms Lesley Kilby Mr Dia Ram Sharma Mr Simon Pritchard Mr Chris Veness Ms Alicia Dunbar Mr Campbell Brumby Mr David Jemmet Mr Jiger Kotecha Mr Michael Betar Mr Tsuyoshi Osumi Mr Barney Hughes Mr David Skipper Mr Trevor Macleod Mr Andrew Earle Ms Lesley Heidtman Mr Ervin Leong Mr Mark Thiele Mr Stewart Coombes Mr Geoff Hammon Gesheng Shen Ms Marsha McMonigle Mr Gino De Stefani Mr Richard Wilken Ms Jo Cameron Mr Lachie Stevens Mr Luke Mancini

Mr Julian Gehrke Ms Jodie Hamilton Mr John Gray

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07 5465 6695 hamiltoncontracting.com.au wakefields.com.au

Broker

Large

Medium

Fox Commodities Grain Brokers Australia Horizon Grain Brokers Pty Ltd Igrain.com.au Pty Ltd INTL FCStone Pty Ltd McDonald Pelz Australia Perkins Commodity Brokers Teague Australia Pty Ltd

Sole Operator

A C Grain ACCB Australia AgLink - CMS Allied Grain Pty Ltd Cereal Milling Services Pty Ltd Cogeser (Australia) Pty Ltd Farm Tender Knight Commodities Link Brokering Mallon Commodity Brokering Quest Commodities Pty Ltd

Corporate

Large

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

Medium

Agfarm Pty Ltd Agrifood Technology Pty Ltd Agrisk Management 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 NZX Australia (ACF, PFA) SBA Law SGS Australia Pty Ltd

Small

Advance Trading Australasia Ag Scientia Pty Ltd

- Mr Paul Cochrane Mr Jeff Winspear Mr Ash Munro Mr Tom Roberts Mr Brett Cooper Mr Peter Geary Mr Craig Perkins Mr Tim Teague
- Mr Adam Clarke Mr Andy Cunliffe Mr Justen Schofield Mr Angus Wettenhall Mr Michael Moss Mr Robert Luetolf Mr Matt Henke Mr Chris Groat Mr Dion Costigan Mr Ian Mallon Ms Jayne Barker Mr Don Cattanach

Mr Kristen Hopkins Mr Ian Hanrahan Mr Haydn Kuchel Mr Tom Barraket Ms Elizabeth Owens

Mr Ron McCalman Ms Doreen Fernandez Mr Brett Stevenson Mr Andrew Parry Mr Mathew Conoulty Mr Simon Kirkman Mr Geoff Farnsworth Mr Stephen Thompson Mr Lee Shilvock Mr Adam Davis Mr Ron Storey Mr Jeremy Rosenthal Mr Scot Paterson

Mr Andrew Woodhouse Mr Lloyd George foxcommodities.com.au grainbrokers.com.au horizongb.com.au igrain.com.au intlfcstone.com mcdonaldpelz.com 03 9645 6846 teague.com.au 8

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asx.com.au/grainfutures anz.com.au agtbreeding.com.au commbank.com.au symbiolabs.com.au 5

agfarm.com.au 03 9742 0589 02 9499 4199 07 3391 8640 commodityinspection.com.au foss.com.au holdingredlich.com hfw.com intertek.com merrickscapital.com nzx.com sbalaw.com au.sgs.com

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advance-trading.com.au 03 9598 1980

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Corporate - Small (cont) CloudBreak Grain Marketing Pty Ltd Basis Commodities Pty Ltd Delta Agribusiness Pty Ltd **Direct Commodities Pty Ltd** EP Integrated Commodities Pty Ltd Farmanco Marketing Pty Ltd FarMarCo Australia Pty Ltd **Finesse Solutions Pty Limited** Flexi Grain Goldstar Commodities Grainx HarvestCheck Pty Ltd Hay Plains Grain Storage Pty Ltd **IKON Commodities Pty Ltd** JBS Australia MarketAg Pty Ltd McMullen Consulting Pty Ltd Mirfak P/L Murray Goulburn Trading Pty Ltd **OMIC Australia Pty Ltd** Perten Instruments Australia Pty Ltd Pinnacle Commodities Pty Ltd Planfarm Marketing Pty Ltd **Primal Foods Group Rural Directions Pty Ltd** SGA Solutions Pty Ltd TE Storage & Logistics Pty Ltd **Ten Tigers**

International Affiliate

CIS - Commodity Inspection Services CCIC Australia Pty Ltd

Industry Association

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 *(Posthumously awarded)*

Mr Ed Scamps Mr Chris Whitwell Mr Michael Parry Mr Hamish Robertson 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 Richard Nicholls Mr Mark Martin Mr Gerard McMullen Mr Mark Murphy Mr Gerard Murphy Mr Yasuhide Okumura Mr Raul Ovelar Mr Rod Buckle Mr Jerome Critch Mr Peter Longhurst Mr Chris Heinjus Mr David Hudson Mr Tom Hage Mr Chris Tonkin

Mr Paul Schweitzer Mr Isherwood Feng

D. McKeon/M. Southan Ms Larissa Taylor Mr Andrew Weidemann Mr Justin Crosby Mr Stephen Sheridan

Ms Rebecca Freeman Mr Colin Peace Ms Joanne Ware Mr John Francis

Retired K M & W M Kelly & Sons Former GTA CEO

> cis-inspections.com 02 9580 3212 2

graingrowers.com.au giwa.org.au grainproducers.com.au 02 8251 1827 03 9207 5555 5

> 0414 844 425 giav.com.au grainnsw.com.au qam.org.au

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Awarded 1998 Awarded July 2015 Awarded July 2016