

15 June 2020

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Via: <https://haveyoursay.agriculture.gov.au/draft-export-plant-rules-2020>

Department of Agriculture, Water and Environment
GPO Box 858, Canberra, ACT 2601,
Australia

RE: Export Control (Plants and Plant Products) Rules 2020

Dear Sir/Madam,

I write regarding the Draft Export Control Rules [Plants and Plant Products] Rules 2020 (Rules) which is currently open for consultation.

1. 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 Grains 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 260 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 attached.

2. General Comments on the Draft Rules

Various issues outlined below were raised by GTA at a recent teleconference outlining the proposed Rules changes, hosted by the Department of Agriculture, Water and the Environment (AWE). Should further explanation be required, please contact GTA.

GTA is broadly supportive of the draft Rules and their apparent intent to simplify regulatory requirements (Acts, Rules etc.) across all commodities and processes to provide greater efficiency and in turn flexibility for industry to manage the export of Australia's grain products. This includes the prescriptive nature of "industry management systems appropriate to the activity being conducted".

We note the Rules stipulate in detail in some sections a range of requirements and obligations. In several instances, these also refer back to the Export Control Act 2020 (Act). It is our understanding the intention of the Rules is to provide "general guidance on AWE/Secretary powers" under the Act, in order to provide sufficient flexibility for AWE and/or the Secretary to specify requirements. However, from a practical perspective when reviewing requirements for specific commodities/operations, while simplified, it still remains confusing for industry if we are required to refer to detailed information/reference in:

- a) The Act;
- b) The Rules; and
- c) The Plant Export Operations Manual (PEOM)

In some instances, information is repeated due to different jurisdictional powers (AWE/Secretary) e.g., suspension/revocation of bulk vessel/container approvals. GTA suggests the Rules could be further simplified by general referencing to the PEOM and Secretary powers/direction. In spite of the above, in other areas, there appears to be a “lack of detail” (please refer to comments below on Samples).

GTA notes that the Fact Sheets on the consultation page list a range of measures in summary where flexibility in the arrangements are now proposed. An example is “Registered establishments and accredited properties”. While that Fact Sheet summarises many of the proposed arrangements, it is not as clear in the draft Rules. As advised in our response in 2019 on the Export Control Bill, GTA has noted and previously provided a number of issues that we strongly suggest require joint industry-Government discussion before implementation and sign-off into the Rules. Noting the current consultation process outlined on the consultation page of the website, we re-enforce our clear and consistent position that the Government abide by its statements to ensure there is close consultation with industry on development the Rules.

3. Specific Comments on the Rules

GTA has previously provided a list of operational aspects that we consider should be specifically addressed in the Rules. This should be via consultation between Government and industry before the Rules are finalised. We re-iterate our views below on those issues and in response to the draft Rules as published for industry comment. As discussed during the consultation teleconference, we look forward to further discussions on several aspects outlined below at future Grain and Plant Products Export Industry Consultative Committee (GPPEICC) meetings prior to the Rules being adopted.

a. General

Section 1-7 Prescribed Grain. We suggest references be more general given that varieties/species to be exported may change over time. For example:

- Canola is *Brassica rapa* and *Brassica napus*.
- Rapeseed is not listed but may be exported and we are led to believe is a Prescribed Grain.
- Soft wheat is *Triticum softii*.

Prepared – We suggest inclusion of a definition or reference to the Grain Preparation Standard that is currently being developed, outlining the minimum “requirements” for an exporter to prepare grain for inspection by an Authorised Officer. Consistency to this reference developed in the Act, Rules and other documents should occur.

Assessor – We suggest inclusion of a definition in the Rules (noting there is one in the Fact Sheet on the consultation page).

b. Accredited Property

Section 3-1 (2) (e) states “the plants and plant products in relation to which the export operations are carried out at the property (the relevant property) can be tracked:

(i) from the property (if any) from which the plants or plant products were transferred to the relevant property”

GTA understands this is in relation to the Accredited Property List, which relates to non-grain (horticulture) only. Please confirm.

c. Suspension of Registration

Section 4-22 outlines “*grounds for suspension by the Secretary*”. In general, the grain industry has been frustrated at the inability of AWE to expedite suspension of approval to export for non-payment of scheduled fees or overdue fees. When commenting on the draft Bill, GTA requested that all aspects of suspension/revocation of accreditation should be strengthened, either in the Bill or Rules, to expedite that process where payment is overdue.

It does not appear that the draft Rules provide any greater powers to the Secretary for suspension relating to financial matters. This needs further addressing.

d. Registered Establishment

Section 4-2 (6) refers to “*If screening of prescribed plants or plant products referred to in **paragraph 4 8H(1)(a) or (b)** is to be carried out at an establishment, the establishment and its equipment and facilities must be designed and constructed to allow the screening to be carried out.*” GTA could not find that reference to paragraph 4-8H (1) (a) or (b).

Section 4-4 (3) (g) (i & iii) states the requirement for a management system whereby “*plants and plant products can be tracked:*

- (i) from the premises from which they were transferred to the establishment; and*
- (ii) while they are at the establishment; and*
- (iii) to the premises to which they are transferred from the establishment;”*

This reads as if the requirement for traceability as listed for an Accredited Property also applies, that is, the Registered Establishment must know the source of the grain which it receives and can track that grain being received. That is not always known nor able to be achieved practically. In the opinion of GTA this clause (i) would add significant costs to industry and is not required. GTA acknowledges the intent of AWE is for grain to be tracked “one step forward/one step back”. The current rules do not clearly explain that intent and require revision. Additionally, as stated, grain may be provided on a just in time basis from several sources – while the deliverer of that grain is known, the location may not be. In this scenario, a full inspection for quality and phytosanitary aspects is undertaken in order to meet relevant RE requirements.

In addition, clause (iii) implies tracking is required from the Registered Establishment to the premises /destination of the grain. This could be considered as not only knowing the overseas destination, but having control of that process. For some shipments (i.e., free on board) that shipment process is outside of the control of the grain supplier/exporter. Review and further discussion on requirements in the Rules to meet obligations but remove any unnecessary and impractical processes that impact on commercial activities is required. Refer also to the Export Permit section below.

Section 4-7 requires that alterations (other than minor) to a Registered Establishment are to be notified. For a mobile loading Registered Establishment, this and other sections of the Rules would require significant administration notification when operations of loading a vessel ceased and for example loading /sampling gear was moved (and thus could be defined as an “Alteration”). Operation of a mobile loading facility needs alternate referencing to cater for the particular operational aspects at those facilities.

e. Export Permit

Section 7-6 (b) states “*Other circumstances in which export permit may be revoked:*
The following circumstances are prescribed in relation to an export permit for prescribed plants or plant products:

- (b) a person, other than the holder of the export permit, has given the Secretary information or a document in relation to the plants or plant products that is false, misleading or incomplete”.*

In our response to the draft Bill we sought further discussion and clarification during development of the Rules in regard to how this relates to exporters signing off compliance for each shipment under industry/country specific protocols such as the Wheat/Barley Industry Management Plan for China and the snail management plan for South Korea. That issue does not appear to have been addressed in the Rules.

Section 7-3 states “For the purposes of paragraph 229(1)(a) of the Act, the following circumstances are prescribed for varying an export permit for prescribed plants or plant products or conditions of an export permit for prescribed plants or plant products:

(g) the export of the plants or plant products could result in trade in the export of goods from Australian territory being adversely affected.

Section 7-6 (d) states “Other circumstances in which export permit may be revoked:

For the purposes of paragraph 233(1)(g) of the Act, the following circumstances are prescribed in relation to an export permit for prescribed plants or plant products:

(d) the export of the plants or plant products could result in trade in the export of other goods from Australian territory being adversely affected”.

It is unclear how these rules would operate in practice, the definition and interpretation of “adversely affected” and the “fairness” of these rules. For example, for a grain commodity, it is unrealistic for an issue for example with a horticultural commodity to impact in such a way on a potential grain export.

As per our previous advice on the draft Bill, GTA requests further discussion to clarify the intent of and revision of the wording and to clearly define wording such as “adversely affected” and “Economic consequences for Australia defined as ‘damage to Australia’s trading reputation’”. We think this wording requires further qualifications, such as “related or similar” plants or plant products, and would be consistent with the Governments stated position to treat trade issues on their individual merits. The implications in this section of the commercial implications of free on board shipments also require addressing.

Section 7-8 states various scenarios where “additional or corrected information is to be given to the Secretary in relation to (c) the holder of the export permit reasonably suspects that a prescribed export condition relating to the plants or plant products has not been complied with in circumstances where the condition should have been complied with.” In relation to insect infestation detected on discharge or prior to discharge, the Rules do not necessarily state that insect detection information (or other objects of quarantine detected in the importing country) is required to be provided to AWE. GTA requests clarification and if necessary discussion on this issue.

f. Audit Reports

Section 9-4 (6) states that “within 10 business days after the audit is completed or ends, the auditor must give a copy of the audit report to the relevant person for the audit”.

This timeframe seems lax given reporting technology available and the importance of reporting findings of an audit in relation to activities undertaken and obligations of a Registered Establishment/Authorised Officer. For example, if a non-conformance was identified that may cause a change in the Registered Establishment status, the report needs to be completed and provided to all relevant parties as soon as possible in order that relevant persons (manager, exporter etc.) are aware and can initiate compliance or other actions. In comparison to this “10 business days’ notice”, suspension or revocation of a bulk vessel notification are listed in the Rules as to be done “as soon as practicable”.

g. Pests

Section 9-15 (1) states “The applicable tolerance level for a kind of pest in relation to a kind of plant or plant product for export to an importing country is:

(a) nil; or

(b) if the Secretary has approved, under subsection 9-18(1), a tolerance level for that kind of pest in relation to that kind of plant or plant product and importing country—the approved tolerance level.

It is acknowledged in MCoR there is a statement for import conditions to virtually all grain markets of consignments must be “free from pests, soil, weed seeds and extraneous material”. GTA understands this statement is to support exports and not prohibit exports of grain that may contain low levels of contaminants that are impractical to remove. It is unclear how the statement in 9-15 (1) above relates to this clause.

Acknowledging the sensitivities of this issue, it is requested that further discussion occur (at GPPEICC) on how sufficient clarity on these statements can be achieved without compromising the intent of the Rules or MCoR instructions.

Section 9-18 states in relation to “Contaminants that are animal carcasses or animal waste (2) The Secretary may approve, in writing, a tolerance level higher than nil for animal carcasses or animal waste (or both) in relation to a kind of plant or plant product for export to an importing country if the higher tolerance level is acceptable to the importing country”. Similar wording occurs in (1) in that Section.

The wording of “is acceptable” implies the importing country would be consulted on this tolerance. Current wording in Volume 8 of the PEOM states a range of tolerances (not nil) for “rodent and vermin droppings and “Tolerance levels imposed by the importing country takes precedence over any tolerances Listed in this manual”. GTA requests wording in the Rules be modified to that in the PEOM. For clarity, “is acceptable” implies asking a country for their acceptable tolerance levels, and if asked, industry would expect the answer to be nil, which would be impractical. Tolerance levels imposed are generally only listed on an Import Permit.

Further to the above, **Section 9-18** “Contaminants other than animal carcasses or animal waste (3) The Secretary may approve, in writing, the tolerance level for a kind of contaminant (other than animal carcasses or animal waste) in relation to a kind of plant or plant product for export to an importing country”.

This statement is thought to refer to the current work instructions/PEOM which outline levels of various contaminants in all exports (unless specified by the import country). In our introduction to this response, GTA sought to work with AWE on developing the rules to “ensure trade can continue uninterrupted as per current arrangements”. For this to occur, GTA requests that AWE clearly outline the process for all arrangements whereby the Secretary permits such matters to occur. This includes our previous comments on the draft Bill in relation to existing Approved Arrangements.

The reason for this request is that industry needs to be confident no changes would be made to any current export arrangements with the introduction of the Rules. In addition, as stated previously, industry requests it is fully and effectively consulted before any changes to export arrangements are made by AWE.

h. Records

Section 11-2 (1) (e) states “A record that is required to be retained under this Part in relation to plants or plant products must be:

- (a) in English; and
- (b) if the record was required to be in another language to meet importing country requirements—in that other language; and
- (c) dated; and
- (d) accurate, legible and able to be audited; and
- (e) signed by the maker of the record”.

GTA would question the need for a signature given the use of on-line and IT platforms to keep records that can be audited. To this matter, **Section 11-3 (2)** and **11-4 (2)** allows for Government certificates to “not be retained in a safe place” if issued by electronic means and **Section 11-10** does not require “records to be retained when entered into the Departments electronic system”. The same flexibility should be granted for all records required to be retained.

As noted previously, those sections of the Rules listed above also show the complexity of interaction in the Act, Rules and PEOM whereby all three may need to be referenced to determine and understand industry obligations.

i. Samples

The Act – 410 states “Methods for taking, testing and analysing certain samples:

(1) This section applies in relation to a sample of goods or any other thing that is to be taken, tested or analysed under this Act (other than in the performance of functions or duties or the exercise of powers under Chapter 10 (compliance and enforcement) or the Regulatory Powers Act).

(2) The sample must be taken, tested or analysed in accordance with:

(a) if a method is prescribed by the rules for that kind of sample—the prescribed method; or

(b) in any other case:

(i) an applicable method specified in the Australia New Zealand Food Standards Code; or

(ii) an applicable method specified in an Australian Standard published by, or on behalf of, Standards Australia; or

(iii) any other appropriate, validated and science-based method approved by the Secretary”.

In the draft Rules, the only reference relating to samples is **Section 11-12 “Storage of Samples”**.

A primary key to determining if a Registered Establishment should be approved, or that an AO can suitably inspect a grain export consignment against requirements, is the ability to obtain a representative sample of the grain being loaded. It is unclear why in some sections of the Act/Rules there are significant levels of detail, yet in relation to the taking of samples the above only applies, with no reference to sampling rates or their representative nature.

As noted in our response on the draft Bill, “Methods for taking, testing and analysing certain samples (**section 410**) – the grains industry has and continues to encounter issues with representative samples across a range of markets. This is a critical issue that the industry has been progressing via a Sampling document that specifies the methods for obtaining representative samples at all locations along the supply chain. Industry is keen to discuss with Government how that document will be referred to and included in the Rules. Additionally, a review of the approved sampling rate at export will be undertaken as part of that process.”

As stated previously, it is assumed the PEOM must be referred to in order to determine requirements, creating complexity in referring to several different document. Further discussion with AWE will assist industry to increase its awareness and obligations in this area.

4. Other Matters Not Covered in the Rules

GTA has previously provided a list of operational aspects that we considered should be specifically addressed in the Rules, however we note they are not covered. We request further discussion on these topics copied again below.

a. Personal Information

Personal Information (e.g., **section 387 of the Act**) – recognising the relevant Acts covering privacy of information, GTA requests that Government consider during the development of the Rules suitable mechanisms or options for assisting industry to adequately communicate and consult on all relevant matters with all grain exporters. For example, GTA does not have access to the official list of exporters as maintained by Government. Access to that list may for example assist in provision of appropriate communication and assist in communication of required standards of practice for exporters.

b. Goods that are prohibited from export absolutely (split vetch)

GTA would question the ongoing need for the prohibition of split vetch to remain in the Act and therefore the draft Rules. Consideration needs to be given to adoption of mechanisms to adequately recognise the commodity to be exported (i.e., split red lentils versus split vetch) and the definition of Prescribed Grains.

c. Return of government certificate

While the Act states the Government may require a Certificate to be returned, sometimes this cannot occur as it is impractical. The development of the e-PHYTO and other electronic documentation will need to be considered under this requirement and all other relevant sections of the Act. The ongoing need for manual documents may also need further consideration when developing Rules on these aspects.

d. Audits of “Export Operations”

As noted in several recent GPPEICC meetings, industry strongly encourages AWE to continue a focus on audit of Registered Establishments. As noted in our comments on the draft Bill, “during development of the Grain Preparation Standard, industry will be seeking further discussion on the need for continued auditing of all relevant export operations including unannounced audits in order to ensure appropriate compliance with the Act”.

As outlined in this submission, there are several other related issues where further discussion between industry and AWE could occur to assist implementation of the Bill/Rules and ensure stronger enforcement activities of AWE.

e. Request for Permit

Current legislation requires all documents are to be completed prior to vessel loading. As identified in the industry Working Group, actions are being implemented to revise processes to more closely adhere to legislation, however, are circumstances where this cannot occur for every shipment. Discussions are required to identify opportunities to create some flexibility to allow for documents (in part/some) post-sailing to be developed provided that international obligations are met, there are no consequential impacts on other government authorities, the industry focus continues for “100% compliance” and any agreed changes are undertaken on a risk-based assessment.

f. Consistency in Interpretation

A key focus of the new Legislation is to “remove duplication and provide consistency in export legislation”. While training and other measures have been implemented to create greater transparency and consistency in application of requirements under the Legislation, industry considers further opportunities are available to ensure consistency in interpretation by all Authorised Officers and Plant Export Operations staff when developing the Rules.

Thank you for the opportunity to provide comments and we look forward to further discussion on the draft Rules as consultation continues until their proposed adoption in 2021.

Yours sincerely,



Pat O'Shannassy
CEO

Membership List as at 30 April 2020

Organisation	Contact	Website /Phone
Ordinary Member (Trading)		
Level A1 (over 7 Million Tonnes)		
CBH Grain Pty Ltd	Mr Jason Craig	cbh.com.au
Glencore Agriculture Pty Ltd	Mr Philip Hughes	glencoreagriculture.com.au
Level A2 (5 - 7 Million Tonnes)		
Graincorp Operations Ltd	Mr Klaus Pamminger	graincorp.com.au
Level A3 (3 - 5 Million Tonnes)		
ADM Trading Australia Pty Ltd	Mr Darryl Borlase	adm.com
Cargill Australia Limited	Mr Erik Wibholm	cargill.com.au
Level A4 (1.5 - 3 Million Tonnes)		
Level B1 (1.0 - 1.5 Million Tonnes)		
Arrow Commodities Pty Ltd	Mr Dominic Vanzella	arrowcom.com.au
Emerald Grain Pty Limited	Mr David Johnson	emeraldgrain.com
Cofco International	Ms Sara Pan	cofcoagri.com.au
Level B2 (500,000 - 1 Million Tonnes)		
Australian Grain Export Pty Ltd	Mr Brett Dodson	australiangrainexport.com.au
CHS Broadbent Pty Ltd	Mr Steve Broadbent	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 Gareth Stapleton	riverina.com.au
Bunge Agribusiness Australia Pty Ltd	Mr Stephen Bennett	bunge.com/agribusiness
Level B3 (250,000 - 500,000 Tonnes)		
Agfarm Pty Ltd	Mr Ron McCalman	agfarm.com.au
Agracom Pty Ltd	Mr Joe Hallman	agracom.com.au
Allied Pinnacle Pty Ltd	Mr Josh Lawrence	alliedpinnacle.com
Robinson Grain Trading Co Pty Ltd	Mr Gary Robinson	robinsongrain.com.au
Wilmar Gaviion Pty Ltd	Mr Matt Albion	07 3713 8700
Louis Dreyfus Company Australia Pty Ltd	Mr Sam Roache	louisdreyfus.com.au
Quadra Commodities Pty Ltd	Mr Robin Cassar	quadra.com
Ordinary Member (Trading)		
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
AACL Pty Ltd	Mr Simon Gellert	trade@australianagriculturalcontracts.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
Agrigrain	Mr Jeremy Brown	agrigrain.com
Agrisk Management Pty Ltd	Mr Brett Stevenson	02 9499 4199
Agromin Australia Pty Limited	Mr Rajni Patel	agromin.com.au
AGT Foods Australia	Michael Brittain	agtfoods.com/australia
Associated Grain	Mr Bhuvan Gandhi	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 Fresh Milk Holdings (AFMH)	Ms Jill Smith	02 6344 8462
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
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
Chester Commodities Pty Ltd	Mr Richard Black	chestercommodities.com.au
CL Commodities Pty Ltd	Mr Robert Lean	clcommodities.com.au
Continental Grain Handling Pty Ltd (CGH)	Mr Rick Guo	08 6333 1068
Coorow Seeds	Mr Brian Pover	coorowseeds.com.au
Coprice	Mr Lyndon Benecke	coprice.com.au
Cory Johnston (Aust) Pty Ltd	Mr Justin Fay	coryjohnston.com.au
Craig Tyack Grain Trading	Mr Craig Tyack	0428 729 167
Dalby Bio-Refining Limited		dbrl.com.au
Darwalla Milling Co Pty Ltd	Mr Gary Heidenreich	07 3822 0527
Deacon Seeds Company	Mr Mark Schmidt	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
East Coast Stockfeed Pty Ltd		ecsf.com.au
Elders Grain	Mr Lachlan Allen	elders.com.au
Ellerslie Free Range Farms Pty Ltd	#REF!	07 4695 5777
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
Findlays Barellan	Mr Neil Findlay	02 6963 9246
Five Star Stock Feeds	Mr Tim Huggins	fssf.com.au
Fletcher International Exports Pty Ltd	Mr Kurt Wilkinson	fletchint.com.au

GO Resources Pty Ltd	Ms Rosemary Richards	go-resources.com.au
Golden Harvest Grain Exports	Mr Chandru Hiremath	goldenharvest.net.au
Gold Star International Pty Ltd	Abhishek Kotkar	goldstarinternational.com.au
Grain Direct Australia	Mr Chris Kochanski	graindirect.com.au
Grain Link (NSW) Pty Ltd	Mr Paul Pearsall	02 6962 9500
Grain Link WA Pty Ltd	Mr Andrew Goyder	grainlink.com.au
Grainforce Pty Ltd	Mr Derek Larnach	02 6331 4880
GrainTrend Pty Ltd	Mr Sanjiv Dubey	graintrend.com
Greentree Farming	Mr David Brown	02 6751 1228
GV Grain & Fodder	Ms Joanne Harry	03 5828 3063
Hanlon Enterprises Grain	Mr Peter Gerhardy	02 6924 1781
Harwood Grains Pty Ltd	Mr Paul Harwood	harwoodgrains.com.au
Harberger's Farm Supplies (Trading) Pty Ltd	Mr Reece Harberger	harberger.com.au
Hutt & Co Pty Ltd T/A GrainSource	Mr Simon Hutt	grainsource.com.au
Independent Grain Handlers Pty Ltd	Mr Brad Bryant	igh.net.au
Irwin Stockfeeds	Mr Bryan Irwin	irwinstockfeeds.com.au
Itochu Australia Ltd	Mr Justin Swan	www.itochu.com.au
J K International Pty Ltd	Mr Sandeep Mohan	jki.com.au
J W Koek & Company	Mr Brian Algate	07 3341 4548
James Stock Feed and Fertilizer Pty Ltd	Mr Adrian Moule	jamesstockfeed.com.au
Jerilderie Grain Storage & Handling	Mr David Barlow	03 5886 0344
KB Agri Services Pty Ltd	Mr Karl Bliss	07 4634 4320
K M & W M Kelly & Sons	Mr Matt Kelly	kellygrains.com.au
Kangaroo Island Pure Grain Pty Ltd	Ms Emma Tonkin	kipuregrain.com
Kennett Rural Services Pty Ltd	Mr Andrew Kennett	kennetrural.com.au
Lachlan Commodities Pty Ltd	Mr Tony Cogswell	02 6851 2077
Laharum Bulk Handling Co	Mr Donald Carter	03 5381 2666
Lake Grain Pty Ltd	Mr Derek Davis	lakegrain.com.au
Lane Grain Pty Ltd	Mr Garry Lane	02 6887 3309
Laragon Almond Processors Pty Ltd	Mr Mark Webber	laragon.com.au
Laucke Flour Mills P/L	Mr Roger Laubsch	laucke.com.au
Lawson Grains Pty Ltd	Mr Angus Blair	lawsongrains.com
LDC Enterprises Australia Pty Ltd	Mr Richard Porter	07 3253 5999
Lemarc Agromond Pty Ltd	Mr Michael Aikman	lemarcagromond.com
LINX Cargo Care	Mr David Simpson	linxcc.com.au
LPC Trading Pty Ltd	Mr Simon Langfield	02 6383 7222
Mandala Trading Pty Ltd	Mr Jayjeev Saraff	mandalatrading.com.au
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	maxgrains.com.au
MC Croker Pty Limited	Mr Greg Carroll	crokergrain.com.au
Melaluka Trading Pty Ltd	Mr Simon Pritchard	melalukatrading.com.au
Mellco Pty Ltd	Mr Steve Mellington	0419 867 971
Moulamein Grain Co-Operative Ltd	Mr Tony Bellinger	moulameingrain.com
MSM Milling Pty Ltd	Mr Peter MacSmith	02 6364 5999
Namoi Cotton Ltd	Mr Shane McGregor	namoicotton.com.au
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
ETG Processing Pty Ltd T/A Wimpak	Mr James French	wimpak.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
Plum Grove Pty Ltd	Ms Rikki Foss	plumgrove.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
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
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
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 Grain Pty Ltd	Mr David Jemmet	03 5437 8295
Spagrimon Australia Pty Limited	Mr Jiger Kotecha	spagrimon.com.au
Standard Commodities Australia Pty Ltd	Ms Elizabeth Bozinoska	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
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
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
Woods Grain Pty Ltd	Mr Bruce Woods	woodsgroup.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

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 Hugh Cox	pacifcnational.com.au
SEAWAY Intermodal Pty Ltd	Mr Bikash Ram	seawayintermodal.com.au

Broker

Large

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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

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Sole Operator

A C Grain	Mr Adam Clarke	0400 065 763
Allied Grain Pty Ltd	Mr Angus Wettenhall	alliedgrain.com.au
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

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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	Ms Katrina Saunderson	commodityinspection.com.au
Foss Pacific Pty Ltd	Mr Phil Soderberg	foss.com.au
Holding Redlich	Mr Geoff Farnsworth	holdingredlich.com
Holman Fenwick Willan	Mr Stephen Thompson	hfw.com
Intertek	Mr Ben Jones	intertek.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	tports.com
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 Ole Houe	ikoncommodities.com.au
Lachstock Consulting Pty Ltd	Mr Nick Carracher	lachstockconsulting.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
Merrick's Capital Pty Limited	Mr Adam Davis	merrickscapital.com
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
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
Wattletree Consulting Pty Ltd	Jon Bucknall	

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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	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	Ms Alexandra Bunton	02 9478 1000
Victorian Farmers Federation	Ms Annabel Mactier	03 9207 5555

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Merchant Association

Grain Industry Association of SA	Mr Ben Noll	+61 8 8361 5601
Grain Industry Association Of Victoria	Mr Colin Peace	giav.com.au
Grain NSW Inc	Ms Joanne Ware	grainnsw.com.au
Queensland Agricultural Merchants Inc.	Mr John Francis	qam.org.au

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Life Members

Mr Mervyn May	Awarded 1998
Mr Christopher Kelly	Awarded July 2015
Mr Geoff Honey	Awarded July 2016
Mr Terry Deacon	Awarded August 2019

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