

5 February 2016

Ms Maria Jarvio
Food, Competition & Investment Branch
Department of Agriculture & Water Resources
GPO Box 858
Canberra ACT 2601

Dear Ms Jarvio,

Re: Global Low Level Presence Policy Initiative (GLI) – Rome, 18-19 February 2016

1. About Grain Trade Australia

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, grain for human consumption and stock feed milling. A list of all members is attached.

2. About the International Grain Trade Coalition

Grain Trade Australia is a member of the International Grain Trade Coalition (IGTC) which is an international not-for-profit association. Formed in 2001, the IGTC is a coalition of national and international not for profit trade associations, councils and corporate stakeholders which are active in the international trade of grain, oilseeds, pulses and derived products (agri-bulks).

The mission of IGTC is to provide advice to governments on the impacts of policy decisions on commercial requirements and economics of the world's food, feed and processing industries.

3. About the Global Alliance for Ag Biotech Trade (GAABT)

The International Grain Trade Coalition (IGTC) is a member of the GAABT which is an alliance of global organisations from grower and producer groups, grain and feed handlers, food and seed industries, and technology providers. GAABT encourages the development of trade policies that facilitate the movement of seed, grain and processing ingredients, and reduce the potential for trade disruptions.

4. Global Low Level Presence Policy Initiative

The Initiative was instigated by Canada with Australia being one of the inaugural members which was a marvellous demonstration of foresight by the Australian Government.

Key agreement by countries in the Initiative was endorsement of the **International Statement on Low Level Presence (Statement)**. GTA supports the Initiative and resulting Statement.

The next meeting of the GLI will be held in Rome from 18 to 19 February 2016.

Within the context of the above organisations, GTA provides comment on the forthcoming Initiative.

5. GTA position

GTA supports the attached GAABT documents:

1. Practical Approach to Address Low Level Presence (LLP); and
2. Principles and Criteria for Proactive Solutions to Address Low Level Presence

Additional comments:

- Although the above documents are based on a global consensus, they are relevant to an evolving Australian marketing environment. It will be many years before Australia has substantial exports of GM grain, however Australia need to be involved in the global discussion and policy setting framework to ensure policies/processes/protocols that are agreed and adopted meet the needs of the Australian grain industry.
- A zero tolerance approach to approved GM events is not a safety issue as the event has been approved in the country of export on the basis of an assessment of food safety in accordance with Codex Plant Guideline.
- It is critical that countries such as Australia take a proactive attitude on LLP rather than wait until an issue arises as:
 - there will be substantial financial consequences for the parties involved; leading to the possible introduction by the trade of
 - risk premiums into the affected market which could lead to food security issues; and
 - giving opponents to the technology the opportunity to unfairly denigrate the science.

6. Conclusion

GTA is appreciative of the commitment of the Australian Government to the Initiative and we would be pleased to provide additional information as required.

Thank you for your consideration of this response.



Geoff Honey
Chief Executive Officer
Grain Trade Australia

**Global Alliance for Ag Biotech Trade (GAABT)¹
Practical Approach to Address Low Level Presence (LLP) of Agricultural
Biotechnology-derived Plant Products in Food, Feed, and Grain for Processing (FFP)**

Proactive Threshold Based on Exporting Country Authorization

This approach proposes a proactive solution that could be implemented by a national government of an importing country. It does not require development of bilateral or multilateral agreements between trading partners. The approach includes a combination of: (i) a provision creating a proactive LLP threshold for the LLP of biotech-derived plant products in FFP imports that have been authorized by at least one country (e.g. the exporting country), on the basis of a food safety assessment undertaken in accordance with the Codex Guideline for the Conduct of Food Safety Assessment of Foods Derived from Recombinant-DNA Plants (CAC/GL 45-2003) (Codex Plant Guideline), but where that product has not yet been fully authorized as FFP in the importing country; and (ii) a mechanism to motivate the submission to the importing country's regulators a safety assessment dossier for the product in question within a certain period of time.

Definition

- LLP is defined as low levels of recombinant DNA plant materials that have passed a food safety assessment according to the Codex Plant Guideline in one or more countries, but may on occasion be present in food in importing countries in which the regulatory approval process is not yet complete.

Detection Limits

- The analytical limit of detection (a "practical zero") is defined as a value of 0.2%, which provides predictability by avoiding false positive detections caused by either sampling inhomogeneity or detection method variability. It is considered the reliable quantitative threshold for routinely used method after accounting for measurement uncertainties from sampling and analytic procedures.

Thresholds

- An LLP threshold of 5% for FFP products is defined for events authorized for use as food in at least one other country whose regulatory system operates in accordance with the Codex Plant Guideline.²

¹ The Global Alliance for Ag Biotech Trade is a "farm to fork" industry coalition that brings together different parts of the agricultural value chain. Working together, we encourage the development of trade policies which facilitate the movement of seed and grain and reduce the potential for trade disruptions. The Alliance represents stakeholders from grower and producer groups, grain and feed handlers, food and seed industries, and technology providers. For more information, please visit www.gaabt.org.

² The GAABT LLP approach is similar to that proposed by the Colombian Ministry of Health and Social Protection in a draft resolution of May 2014. That resolution includes a provision creating a 5% LLP threshold for LLP in food imports that have been approved by at least one country on the basis of an assessment of food safety in accordance with Codex Plant Guideline where that product has not yet been approved for food use in Colombia.

- An LLP threshold is based on single events only; LLP thresholds are not cumulative.

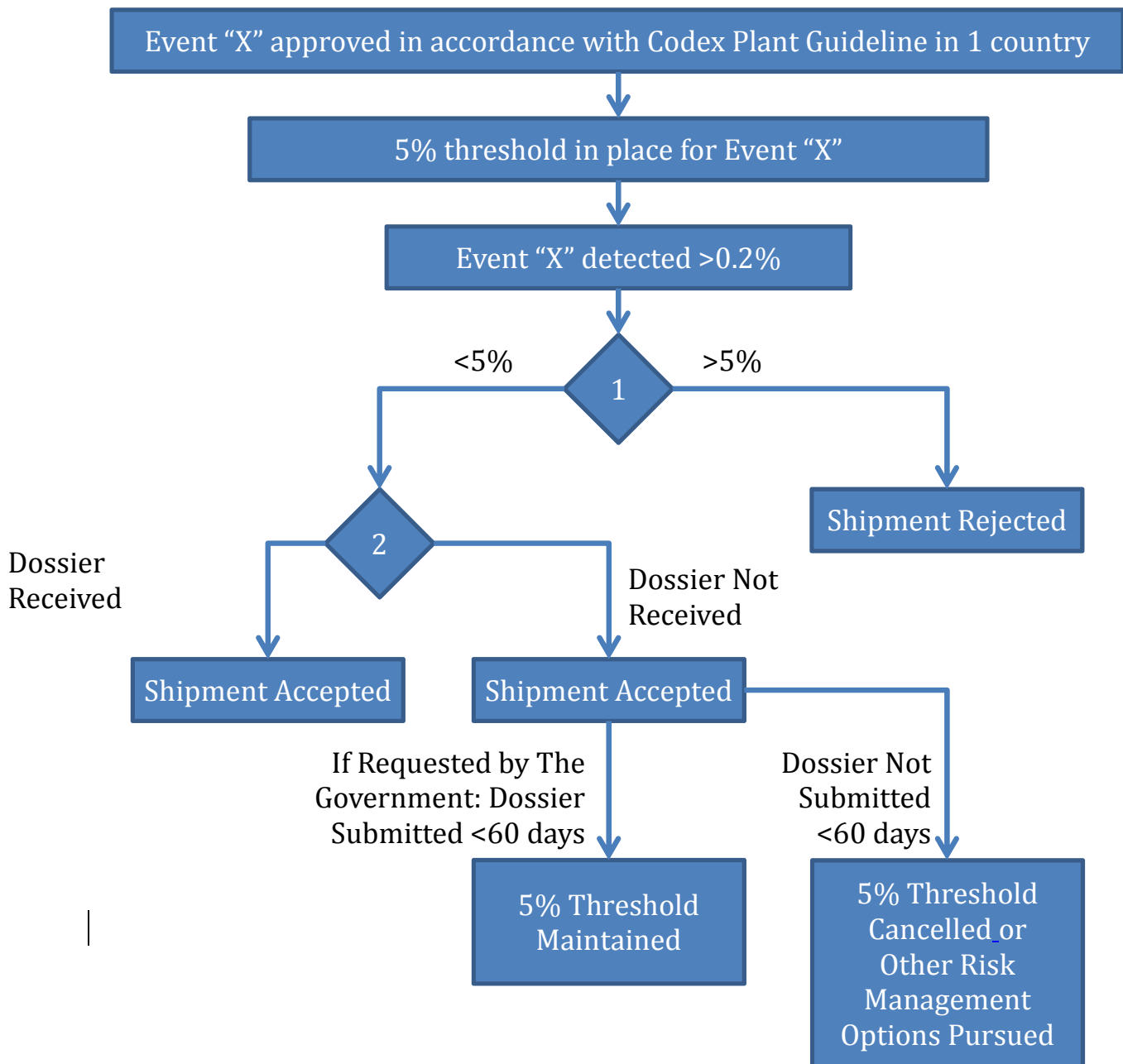
Process (See Appendix 1 for a visual representation of the process)

1. If an event that is not yet authorized in the importing country is detected above the LLP threshold, then the shipment should be managed in accordance with relevant national laws and regulations.
2. If an event that is not yet authorized in the importing country is detected at or below the LLP threshold AND the government has previously received a regulatory submission for FFP for that event, then:
 - o The shipment shall be accepted.
 - o No action is required by the importer, shipper, or developer.
3. If an event that is not yet authorized in the importing country is detected below the LLP threshold AND the government has not received a regulatory submission for FFP for that event, then:
 - o Option 1: The government can decide if any further action is warranted.
 - o Option 2: The shipment shall be accepted and the government will notify the developer of the event that they have 60 days to submit a dossier for approval of the event as FFP.
 - If the developer submits a dossier within the 60-day period, the 5% threshold will remain in force until the FFP evaluation process is completed.
 - If the developer does not submit a dossier by the end of the 60-day period, the 5% threshold may expire for subsequent imports or the government may take further risk management actions at its discretion.
 - o If the FFP evaluation process results in a negative opinion or unauthorized status, the 5% threshold will expire and the government may take further risk management actions at its discretion.

Regulatory Action by the Importing Country

- Given that a full safety assessment has already been undertaken by at least one country, this approach does not require or rely upon a separate LLP risk assessment by the importing country detecting the LLP.

Appendix I
Proactive Threshold Based on Exporting Country Authorization
Process Flow Chart



Appendix II

Additional Questions About GAABT Positions on LLP Policies

1. Why does GAABT support a 5% threshold in this practical approach?

- Recognizing that LLP situations involve agricultural biotechnology products that have been determined by a risk assessment consistent with the Codex Plant Guideline to be safe to human and animal health and the ag biotech product is subject to further regulatory clearance by the importing government - the respective importing government should assign a technically feasible, cost effective and practical threshold to accommodate the importation of commodities that may contain the crop biotechnology event that is yet to be provided full import approval for use in food, feed and processing.
- Economic modeling indicates that a threshold at excessively low percentage will lead to a significant increase of the price of food. GAABT supports a 5% threshold as all food safety concerns have been addressed, and governments are encouraged to adopt LLP policies that do not create unnecessary and costly disruptions to supply chains globally. International trade experience confirms that 5% levels can be achieved with minimal cost impact within the global handling and transportation system.

2. What are some key best practices for developing an LLP policy?

- Harmonization of policies for both food and feed imports: LLP policies must apply to both food and feed. Nearly all crops are produced for food, feed and for processing. History confirms that split approvals (separate approvals for food or feed only) often lead to costly trade disruptions. While separate safety assessments may be performed for food and feed, LLP management policies adopted by governments should apply to both food and feed.
- Proactive protocols applied in all cases: Recognizing that the purpose of LLP policies is to avoid trade disruptions, protocols to manage LLP must be proactive, transparent and predictable. Agreements between buyers and sellers of bulk commodities are typically finalized three-six months ahead of delivery. Understanding the legal status well in advance of harvest of an ag biotech product currently in production is critical to ensure that products move predictably from areas of surplus to areas of deficit and in the most efficient manner possible. Failure to develop and implement a proactive, transparent LLP policy could lead to increased trading risks, such as demurrage charges, risk premiums and supply shortages for the country of import.

3. What is GAABT's view of an LLP policy that includes an expedited LLP risk assessment?

- GAABT understands that as each jurisdiction works with its industry stakeholders to find an approach that is achievable under existing legislative and regulatory frameworks, many approaches to managing LLP may be considered.

- GAABT's proposed solution supports creation of a proactive LLP threshold for ag biotech products that have been authorized by at least one country in accordance with the Codex Plant Guideline, but where that product has not yet been fully authorized for FFP in the importing country. It does not contemplate the completion of a separate risk assessment for LLP purposes. Both the timeliness and outcome of such a process would be uncertain, and a policy that incorporates a separate risk assessment for LLP purposes may not provide adequate predictability nor facilitate trade.
- However, if a government desires to conduct an expedited risk assessment of the LLP situation, it should conduct that assessment in a proactive manner upon receipt of a request to do so by an applicant. GAABT supports a timeframe of no more than 60 days from receipt of an application to a finding by a regulator.
- Expedited risk assessments may be conducted by reviewing information and conclusions in published safety assessments from other competent regulatory authorities. Alternatively, regulators could define a limited data set of information to be provided by the applicant in relation to an LLP risk assessment, consistent with the requirements of Annex III of the Codex Plant Guideline.
- If the applicant has provided a complete data set and is currently seeking a full food/feed approval, the LLP threshold should be valid until the full food/feed approval process was complete.

4. How can an importing jurisdiction ensure compliance with the threshold?

- Once a low level presence policy has been established in a country of import, there may be requirements to assure that the presence of the event in imported commodity shipments intended for use as food, feed or for further processing is compliant with that policy, including that it does not exceed the threshold for that event.
- A key objective of LLP policy is trade predictability. Approaches that rely entirely on routine testing of imported commodity shipments to ensure any LLP is at or below the stated threshold do not meet the requirements of an LLP policy for assuring trade predictability and are not practical or efficient for the commodity supply chain. Testing is expensive (capital investment in testing laboratories, personnel, etc.), time-consuming, and is subject to sampling and detection errors. As such, it unnecessarily risks jeopardizing the predictable flow of commodities into an importing country. This increased risk translates to increased cost for all stakeholders.
- GAABT believes that one approach to compliance is through management practices employed in the country of production. Compliance with thresholds could be addressed using system evaluations or process control systems. These approaches can be designed to meet the same quality standard (i.e. a defined threshold), but in a more transparent, proactive, economical and efficient manner. Systems evaluations are common in other sectors of global agriculture and food trade (e.g. the OECD Seed Schemes for varietal certification), and these experiences could be adapted to production and handling systems that deliver food, feed, and grain for processing to customers around the world.

5. What is GAABT's view of potential work by governments in the Global LLP Initiative on a multilateral approach to LLP?

- GAABT supports ongoing bilateral and multilateral efforts by countries participating in the GLI to understand commonalities in their data requirements and safety assessment processes. GAABT encourages GLI governments to use the knowledge of these similarities in their regulatory assessments to support efforts to develop workable national LLP policies that are consistent with the principles and criteria articulated in the GAABT documents.

6. Does the LLP approach described here apply to single events only?

- Biotech traits are typically introduced in crop plants as individual "events". In turn, regulators evaluate the safety of, and authorize the use of individual single events.
- Increasingly, new varieties or hybrids contain combinations of individual events that are brought together by conventional breeding. These are referred to as "stacks" or "breeding stacks". Events are often combined in a "stack" to deliver the characteristics that growers desire in a single seed. For example, insect protection traits may contain individual events that provide multiple modes of action or protect against more than one damaging pest.
- Where crops containing individual single events have each been determined to be as safe as their conventional counterparts in at least one country, it can generally be concluded, based on the knowledge and experience of conventional breeding, that the presence of a breeding stack containing multiple single events is also as safe as the conventional varieties (Steiner et al., 2013; Pilacinski, et al., 2011, Kok et al., 2014).
- Accordingly, GAABT believes that a reasonable LLP threshold should apply to individual events in a grain shipment and not cumulatively in the rare instance when multiple events that are not yet approved may be present. This stance is scientifically supported by the safety demonstrated for the numerous breeding stack products that have been on the market for many years and reflects the realities of the mixes of varieties present in commercial grain trade.
- A cumulative event threshold would be impractical to implement and increase compliance uncertainty for government officials, grain exporters and importers.

7. What happens if an event is not approved and a threshold is cancelled?

- Developers will be strongly motivated to maintain the 5% threshold (by ensuring that a safety assessment submission dossier is submitted within 60 days), as a failure to do so could cause disruption in the value chain.
- If the event is not approved, the 5% threshold is cancelled for an event (Event X). The 5% threshold would be re-established when a dossier is received by the appropriate regulator.

8. Why should LLP be considered differently than a product not yet approved by any regulatory authority (i.e., Adventitious Presence)?

- The very definition of LLP means that the product has already undergone a full and rigorous safety assessment, has been found to be safe and has been authorised for unrestricted use in FFP by the competent government authority in at least one country. For that reason, LLP of that product should not be thought of as a food or feed safety issue for other countries. Rather, it is an issue of noncompliance with the importing country's regulations for a product with at least one existing completed full safety assessment and a history of safe use.



Global Alliance for Ag Biotech Trade (GAABT)¹
**Principles and Criteria for Proactive Solutions to Address Low Level Presence of
Agricultural Biotechnology-derived Plant Products in Food, Feed, and Grain for Processing**

Low Level Presence (LLP) is defined as low levels of recombinant DNA plant materials that have passed a food safety assessment according to the Codex Guideline for the Conduct of Food Safety Assessment of Foods Derived from Recombinant-DNA Plants (CAC/GL 45-2003) (Codex Plant Guideline) in one or more countries, but may on occasion be present in food in importing countries in which the regulatory approval process is not yet complete.

Practical solutions to address LLP in Food, Feed, and Grain for Processing (FFP) should be based on the following **principles**²:

1. Zero presence of commercialized agricultural biotech-derived products in global trade is not practical or achievable due to underlying biological realities, production constraints and commodity handling systems.
2. The very definition of LLP includes only products that have already passed a safety assessment by at least one regulatory authority according to the Codex Plant Guideline, thereby reinforcing the fact that products detected as LLP are safe for food and feed purposes.
3. Food and feed safety assessments should be science-based.
4. Application of LLP solutions is temporary and hence does not replace the goal of obtaining approval for imports of FFP.
5. Risk management approaches should be proportionate to risk.
6. Existing national legal frameworks and sovereign authority of individual governments should be respected.
7. Solutions should be compatible with international standards and agreements.
8. Importing and exporting governments should work together to harmonize agricultural biotechnology policies and synchronize trait approvals for FFP.
9. Information related to the commercial and regulatory status of agricultural biotechnology traits should be publicly available, comprehensive and up-to-date.

Additionally, practical LLP solutions for FFP should satisfy a number of fundamental **criteria**³, and should therefore:

¹ The Global Alliance for Ag Biotech Trade is a “farm to fork” industry coalition that brings together different parts of the agricultural value chain. Working together, we encourage the development of trade policies which facilitate the movement of seed and grain and reduce the potential for trade disruptions. The Alliance represents stakeholders from grower and producer groups, grain and feed handlers, food and seed industries, and technology providers. For more information, please visit www.gaabt.org.

² Principles are either statements of fact (e.g., zero presence is not possible) or conform to general rules of trade (e.g., respect sovereign authority).

1. Prevent trade disruption by supporting a proactive approach.
2. Be predictable, efficient and achievable for all stakeholders, including governments and industry.
3. Be enforceable by government authorities.
4. Be amenable to specific thresholds that are realistic, practical and based on the realities of grain handling practices and international trade.
5. Be comprehensive in scope, covering products developed and marketed in any country, including products intended for FFP, and both private and public sector traits.
6. Be transparent, providing safety assurance to the public.

³ Criteria are the elements of a system that should be optimized to obtain the best possible system.

Membership List as at 15 December 2015

Organisation	Contact	Website /Phone
Ordinary Member (Trading)		
Level A1 (over 7 Million Tonnes)		
Co-operative Bulk Handling Limited	Mr Jason Craig	cbh.com.au
Glencore Grain Pty Ltd	Mr Phillip Hughes	glencoregrain.com.au
		2
Level A2 (5 - 7 Million Tonnes)		
Cargill Australia Limited	Ms Penne Kehl	cargill.com.au
		1
Level A3 (3 - 5 Million Tonnes)		
ADM Trading Australia Pty Ltd	Mr Tim Henry	adm.com
Graincorp Operations Ltd	Mr Neil Johns	graincorp.com.au
		2
Level A4 (1.5 - 3 Million Tonnes)		
Emerald Grain Pty Limited	Mr John Warda	emeraldgrain.com
Nidera Australia Pty Ltd	Mr David Lengren	nidera.com.au
		2
Level B1 (1.0 - 1.5 Million Tonnes)		
Bunge Agribusiness Australia Pty Ltd	Mr Chris Aucote	bunge.com/Agribusiness
CHS Trading Company Australia	Mr Bryce Banfield	chsinc.com.au
Louis Dreyfus Australia	Mr Robert Green	louisdreyfus.com.au
		3
Level B2 (500,000 - 1 Million Tonnes)		
Agrex Australia Pty Ltd	Ms Katrina Liston	agrexaustralia.com.au
George Weston Foods Limited	Mr Mark O'Brien	gwf.com.au
Inghams Enterprises Pty Limited	Mr Graeme Dillon	ingham.com.au
Plum Grove Pty Ltd	Mr Tony Smith	plumgrove.com.au
Ridley Agriproducts Pty Ltd	Mr Michael Reeves	agriproducts.com.au
Riverina (Australia) Pty Ltd	Mr Jon Mulally	riverina.com.au
		6
Level B3 (250,000 - 500,000 Tonnes)		
Agracom Pty Ltd	Mr Joe Hallman	agracom.com.au
AGRIGRAIN	Mr Jeremy Brown	agrigrain.com
Arrow Commodities Pty Ltd	Mr Dominic Vanzella	arrowcom.com.au
Australian Grain Export Pty Ltd	Mr John Thiele	08 8832 2800
Australian Grain Growers Co-operative Limited	Mr Ian Schofield	aggcoop.com.au
Centre State Exports Pty Ltd	Mr Jeff Voigt	centrestateexports.com.au
Chinatex Australia Pty Ltd	Mr Jiling Lai	02 9957 2688
Lempriere Grain Pty Ltd	Mr Jonathan Holdsworth	lemprieregrain.com.au
Mitsui and Co (Australia) Ltd	Mr Kane Fukuoka	mitsui.com
Riordan Grain Services	Mr Bradley Hogan	riordangrains.com.au
Special One Grain Accumulator	Ms Jaimee Carrigan	specialonegrain.com.au
United World Enterprises Pty Ltd	Mr Jimmy Liu	uwetypical.com
Wilmar Gaviola Pty Ltd	Mr Matt Albion	07 3713 8700
		13

Ordinary Member (Trading) (contd)

Level C (under 250,000 Tonnes)

A & B Grains Pty Ltd	Mr Rod Wolski	abgrains.com.au
A T Waterfield & Son Pty Ltd	Mr Brad Waterfield	03 5382 3725
A W Vater and Co	Mr Kim Vater	vater.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
All Commodities Pty Ltd	Mr Nathan Holmes	allcommodities.com.au
Allied Mills	Mr Simon Gelling	alliedmills.com.au
AMPS Agribusiness Group	Mr David Caldwell	ampsagribusiness.com.au
Associated Grain	Mr Todd Jorgensen	07 4662 1999
Auscott Ltd	Mr Peter Webb	auscott.com.au
Ausrealt International Pty Ltd	Mr Robin Luo	ausrealt.com.au
Australia Milling Group Pty Ltd	Mr Peter Wilson	aumg.com.au
Australian Grain Storage	Mr Matt Bailey	sunrice.com.au
Australian Growers Direct Pty Ltd	Mr Jamie Smith	ausgrowersdirect.com.au
Avigrain Produce	Mr Dennis Ward	avigrain.com.au
Baker Grain	Mr Richard Baker	bakergrain.com.au
Barooga Agriproducts	Mr Andrew Leighton-Daly	03 5875 2202
Berriwillock Grain Storage Co-Operative Ltd	Mr Tony Bellinger	moulameingrain.com
BFB Pty Ltd	Mr Terry Brabin	bfb.com.au
Big River Feeds Pty Ltd	Mr Bjorn Ludvigsen	08 8532 4434
Blairs Produce Company	Mr Sean Blair	02 6025 4600
Blue Ribbon Seed and Pulse Exporters	Mr Stephen Donnelly	07 3363 8400
Boort Grain Co-Operative	Mr Tony Bellinger	03 5455 2600
Broadbent Grain Pty Ltd	Mr Justin Fay	broadbentgrain.com.au
Broun and Co Grain Pty Ltd	Mr Wal Broun	brounandco.com.au
Bungulla Farming Pty Ltd	Mr Brad Jones	08 9637 1164
C & S Trading Pty Ltd	Mr Craig Scholz	scholzbh.com.au
C K Tremlett Pty Ltd	Mr Andrew Tremlett	08 8524 9050
Cameron Pastoral Company Pty Ltd	Ms Ross Stephens	07 4671 4144
Castlegate James Australasia Pty Ltd	Mr Dominic Hogan	castlegatejames.com.au
Cleveland Agriculture	Mr Chris Hurwood	02 6756 5004
Commex International Pty Ltd	Ms Mariam Boulos	02 9531 7341
Coorow Seeds	Mr Brian Pover	coorowseeds.com.au
COPRICE	Ms Kirsty Cutter	coprice.com.au
Cremer Australia Pty Ltd	Mr Brendan Macauley	cremer.de
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
Donnellons Bulk Haulage Pty Ltd	Mr Bill Donnellon	0428 136 483
East Coast Stockfeed Pty Ltd	Mr Stuart Dolden	ecsf.com.au
Elders Grain	Mr Matthew Tolmachoff	elders.com.au
Export Trading Group Australia Pty Ltd	Mr Shayne Clark	etgworld.com
Feed Central Pty Ltd	Mr Tim Ford	feedcentral.com.au
Fellows Nominees	Mr Paul Fellows	fellowsbulk.com.au
FertInvest Pty Ltd	Mr Preyesh Barar	fertinvest.com
Findlays Barellan	Mr Neil Findlay	02 6963 9246

Level C (under 250,000 Tonnes) cont.

Fletcher International Exports Pty Ltd	Mr Kurt Wilkinson	fletchint.com.au
FREE Eyre Grain Pty Ltd	Mr Mark Rodda	free-eyre.com.au
Golden Harvest Grain Exports	Mr Chandru Hiremath	goldenharvest.net.au
Goldman Sachs Financial Markets Pty Ltd	Mr Nick Carracher	gs.com.au
Goodman Fielder Limited	Mr Alex Krzanic	goodmanfielder.com.au
Grain Direct Australia	Mr Lyndon Benecke	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
Grainpro Pty Limited	Ms Angela Greenhalgh	grainpro.net.au
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
Hassad Australia Operations Company Pty Ltd	Mr James Carson	02 8019 7150
Iloura Resources Pty Ltd	Mr Hans Hol	iloura-resources.com
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 Chris Kelly	kellygrains.com.au
Kangaroo Island Pure Grain Pty Ltd	Ms Emma Tonkin	kipuregrain.com
Kennett Rural Services Pty Ltd	Mr Andrew Kennett	kennettrural.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
Langdon Grain Logistics	Mr Adrian Murphy	langdongrainlogistics.com.au
Laragon Almond Processors Pty Ltd	Mr Mark Webber	laragon.com.au
Laucke Flour Mills P/L	Mr Roger Laubsch	laucke.com.au
LDC Enterprises Australia Pty Ltd	Mr Richard Porter	07 3253 5999
LPC Trading Pty Ltd	Mr Simon Langfield	02 6383 7222
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
Mountain Industries Pty Ltd	Mr Keith Morgan	mountainindustries.com.au
Moxey Farms Pty Limited	Mr Peter Philipzen	0407 103 158
MSM Milling Pty Ltd	Mr Peter MacSmith	02 6364 5999
Murrumbidgee Grains Pty Ltd	Mr Peter Hassall	02 6937 9100
Namoi Cotton Co-Operative	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
Noble Resources Australia Pty Ltd	Mr Josh Taylor	thisisnoble.com
Northern Riverina Grains Pty Ltd	Mr Tony Bellinger	03 5032 2553
OOMA Enterprises NSW Pty Limited	Mr Malcolm Berry	oomaenterprises.com.au
Origin Grain Pty Ltd	Mr Peter Brick	03 5720 8500
Pallinup Logistics Pty Ltd	Kevin Imberti	0429 508 302

Level C (under 250,000 Tonnes) cont.

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 Commodities (Australia) Pty Ltd	Mr Jogesh Virk	07 35 537 111
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 Andrew Jackson	quadra.com
Quirindi Grain & Produce	Mr John Webster	02 6746 1911
Regal Seed & Grain P/L	Mr Damien White	regalseed.com.au
Reid Stockfeeds Pty Ltd	Mr Ian Reid	reidstockfeeds.com.au
Rivalea (Australia) Pty Ltd - Animal Nutrition	Mr Andrew Philpotts	rivalea.com.au
Riverina Oils & BioEnergy Pty Ltd	Mr Lachlan Herbert	riverinaoils.com
Robinson Grain Trading Co Pty Ltd	Mr Gary Robinson	robinsongrain.com.au
Roty Grain Store	Mr Brian Newman	02 6988 8221
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 Ark Storage Pty Ltd	Mr Simon Pritchard	arkstorage.com.au
Southern Cotton Trading Pty Ltd	Mr Chris Veness	02 69 552 779
Southern Cross Agricultural Exports P/L	Mr Matthew Barnes	0427 876 643
Southern Grain Storage Pty Ltd	Mr Campbell Brumby	03 5267 2351
Southern Stockfeeds (Operations) Pty Ltd	Mr Brendan Maher	03 5437 8295
Spagrimon Australia Pty Limited	Mr Jiger Kotecha	spagrimon.com.au
Standard Commodities Australia Pty Ltd	Mr Michael Betar	stancom.com.au
Sumitomo Australia Pty Ltd	Mr Tsuyoshi Osumi	sumitomocorp.com.au
Summer Hill Grains	Mr Barney Hughes	0428 694 363
Tasmanian Agricultural Producers Pty Ltd	Mr David Skipper	tasagproducers.com.au
TSS Grain	Mr Trevor Macleod	tasstockfeed.com.au
Thallon Grains Pty Ltd	Mr Andrew Earle	02 6756 5004
Twynam Pastoral Company	Ms Lesley Heidtman	twynam.com
Unigrain Pty Ltd	Mr Ervin Leong	unigrain.com.au
Unique Grain Management Pty Ltd	Mr Mark Thiele	uniquegrain.com.au
W B Hunter Pty Ltd	Mr Stewart Coombes	03 5821 5744
Ward McKenzie Pty Ltd	Mr Mal Parkhill	mckenziefoods.com.au
Whitty Produce	Ms Marsha McMonigle	03 5721 6588
Whyalla Beef Pty Ltd	Mr Gino De Stefani	whyallabeef.com.au
Wilken Grain	Mr Richard Wilken	wilkens.com.au
Wimpak Export Company Pty Ltd	Ms Jo Cameron	wimpak.com.au
XLD Grain Pty Ltd	Mr Lachie Stevens	xldgrain.com.au

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Transport Operator

Gehrke Grains and Transport Pty Ltd	Mr Julian Gehrke	07 5465 6695
Wakefield Grain Export Services	Mr John Gray	wakefields.com.au

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Broker

Large

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Medium

Allied Grain Pty Ltd	Mr Angus Wettenhall	alliedgrain.com.au
Brightcom Australia Pty Ltd	Mr Simon Robertson	03 9591 6300
Cereal Milling Services Pty Ltd	Mr Michael Moss	02 4323 9339
Fox Commodities	Mr Paul Cochrane	foxcommodities.com.au
Grain Brokers Australia	Mr Jeff Winspear	grainbrokers.com.au
Horizon Grain Brokers Pty Ltd	Mr Ash Munro	horizongb.com.au
Igrain.com.au Pty Ltd	Mr Tom Roberts	igrain.com.au
Intl FC Stone 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

AgLink - CMS	Mr Justen Schofield	aglinkcms.com.au
Cogeser (Australia) Pty Ltd	Mr Robert Luetolf	cogeser.com.au
Farm Tender	Mr Matt Henke	farmtender.com.au
Knight Commodities	Mr Chris Groat	07 4671 5221
Mallon Commodity Brokering	Mr Ian Mallon	mcbrokering.com
Quest Commodities Pty Ltd	Ms Jayne Barker	questcommodities.com.au
Shearwater International Pty Ltd	Mr Don Cattanach	07 3324 9088
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 Kristen Hopkins	asx.com.au/grainfutures
Australia And New Zealand Banking Group	Mr Ian Hanrahan	anz.com.au
Commonwealth Bank of Australia	Mr Tom Barraket	commbank.com.au
Symbio Laboratories	Ms Elizabeth Owens	sybiolabs.com.au

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Medium

Agfarm Pty Ltd	Mr Ron McCalman	agfarm.com.au
Agrifood Technology Pty Ltd	Ms Doreen Fernandez	03 9742 0589
Agrisk Management Pty Ltd	Mr Brett Stevenson	02 9499 4199
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 Lee Shilvock	intertek.com
Merricks Capital Pty Limited	Mr Adam Davis	merrickscapital.com
NZX Australia (CGX, ACF, PFA)	Mr Nathan Cattle	nzx.com
SBA Law	Mr Jeremy Rosenthal	sbalaw.com
SGS Australia Pty Ltd	Mr Scot Paterson	au.sgs.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
AvantAgri Australia Pty Ltd	Mr Peter Woods	avantagri.com.au
CloudBreak Grain Marketing Pty Ltd	Mr Ed Scamps	08 8388 8084
Basis Commodities Pty Ltd	Mr Chris Whitwell	basiscommodities.com.au
Delta Agribusiness Pty Ltd	Mr Michael Parry	02 6772 0000
Direct Commodities Pty Ltd	Mr Hamish Robertson	directcommodities.com.au

Corporate - Small (cont)

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
Grain Storage Solutions	Mr Kerry Miles	grainstoragesolutions.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
IKON Commodities Pty Ltd	Mr Simon Clancy	ikoncommodities.com.au
JBS Australia	Mr Richard Nicholls	jbssa.com.au
MarketAg Pty Ltd	Mr Mark Martin	02 6747 1590
McMullen Consulting Pty Ltd	Mr Gerard McMullen	03 8300 0108
Mirfak P/L	Mr Mark Murphy	mirfak.com.au
Murray Goulburn Trading Pty Ltd	Mr Gerard Murphy	03 5862 2799
OMIC Australia Pty Ltd	Mr Yasuhide Okumura	omicaustralia.com.au
Perten Instruments Australia Pty Ltd	Mr Raul Ovelar	02 9870 3400
Peter McQueen Pty Limited	Mr Peter McQueen	petermcqueen.com
Pinnacle Commodities Pty Ltd	Mr Rod Buckle	pinnaclecommodities.com.au
Planfarm Marketing Pty Ltd	Mr Jerome Critch	planfarm.com.au
Primal Foods Group	Mr Peter Longhurst	02 8011 4182
Rural Directions Pty Ltd	Mr Chris Heinjus	ruraldirections.com
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

CIS - Commodity Inspection Services	Mr Paul Schweitzer	cis-inspections.com
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Industry Association

Grain Growers Limited	Ms Alicia Garden	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 Justin Crosby	02 8251 1827
Victorian Farmers Federation	Mr Stephen Sheridan	03 9207 5555

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Merchant Association

Grain Industry Association of SA	Mr Tim Mee	08 8395 3572
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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