

Grain Trade Australia Limited PO Box R1829 Royal Exchange NSW 1225

Phone: +61 2 9235 2155 Fax: +61 2 9235 0194

10 June 2014

# **Review of Coastal Trading**

#### 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 endusers and exporters. GTA members are involved in grain trading activities, grain storage, grain for the human consumption and stock-feed milling industries.

GTA also attracts membership from organisations aligned to the grains-value- chain in related commercial activities such as financial (banking, stock exchanges etc.); communications;, grain advisory services, and professional services (e.g. solicitors and accountants). The GTA membership list is attached.

Within this context, GTA provides comment for consideration on various issues relating to coastal shipping that impact on the Australian grain trade.

### **Background**

Grain is grown in all states with approximately 40% of Australian production coming from Western Australia.

The grain market in the eastern states of Queensland, NSW and Victoria is underpinned by a substantial domestic market based off flour/food processing industries and intensive livestock production. This is in direct variance to both Western Australia and South Australia who have a limited domestic market and are almost totally reliant on export markets.

Due to sub optimal production, invariably as a result of dry conditions, there are occasions when there is demand in the eastern states that cannot be fulfilled by locally produced grain. On these occasions grain can be:

- 1. shipped from Western Australian and South Australian ports to eastern states; and/or
- 2. imported possibly from North America and Britain/Europe as a result of the cost structure/legislative imperatives of Australian coastal shipping.

This submission is tendered on this basis.

## Coastal shipping should be open to competition

Current restrictive practices that favour Australian flagged ships should be discontinued as they inhibit least cost pathways for ship bound trade between the states. In this regard, Grain Trade Australia supports similar comments from the Australian Competition and Consumer Commission submission to this enquiry that called for increased competition in coastal shipping services as this should drive down prices for consumer goods and manufacturing inputs.

In relation to the grain industry, the current regulations on coastal trading within Australia means interstate shipping is not a cost effective freight option and is not flexible to meet the variable and opportunistic nature of domestic grain demand.

The current regulation requires a minimum of five vessel bookings with the first option being made available to Australian flagged vessels. As stated by Warren Truss in releasing the Regulation of Coastal Shipping Options Paper "Our domestic freight task is growing rapidly and shipping should be carrying a larger share of the load. There is a growing disparity between the cost of shipping domestically and the cost of shipping to Australia from overseas."

Opportunities do arise when there is a supply/demand imbalance between east and west that could be alleviated by shipping grain, however, this trade opportunity can be compromised by the current restrictive requirements that force grain trading operators to either comply with the requirements on a higher cost basis or, as often happens, forego the opportunity to the detriment of grain producers. In either case, the Australian economy suffers with decreased economic activity.

Changes to coastal trading regulation would allow more efficient and cost effective movements of grain within Australia.

### 4. Marine safety and biosecurity

Australia has an enviable record in regards to marine safety and biosecurity. These two issues should not be affected by changes to the arrangements for coastal shipping.

GTA is a member of the Department of Agriculture Biosecurity Grain & Plant Product Export Industry Consultative Committee and, whilst the primary focus of the Committee is on exports, the Committee is also able to act in an advisory capacity to national and state biosecurity regulators.

Prior to the loading of grain, a ship is required to pass two surveys:

- 1. **marine survey** that assess seaworthiness/structural ability; and
- 2. **phytosanitory survey** to ensure the ship holds are clean, odour free and free of live grain insects.

GTA would not support amendments to the above requirements.

#### 5. Conclusion

Grain Trade Australia welcomes the opportunity to further discuss this submission if required.

Yours faithfully

**Geoff Honey** 

**Chief Executive Officer** 



Organisation	Contact	Website /Phone
ndustry Association		
Agforce Queensland	Mr Wayne Newton	07 4699 5526
Grain Growers Limited	Ms Kamani Krishnan	graingrowers.com.au
Grain Industry Association of WA	Ms Johanna Gastevich	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 Steve Sheridan	03 9207 5555
Merchant Association		
Grain Industry Association of SA	Mr Tim Mee	08 8395 3572
Grain Industry Association Of Victoria	Mr Terry Roche	giav.com.au
Grain NSW Inc	Mr Steve Fieldus	grainnsw.com.au
Queensland Agricultural Merchants Inc.	Mr John Francis	qam.org.au
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 David Mattiske	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)		
Alfred C Toepfer International (Australia) Pty Ltd	Mr David Drabsch	08 8425 4944
Emerald Group Australia Pty Limited	Mr Brian Dalitz	emeraldgrain.com
Graincorp Operations Ltd	Mr Neil Johns	graincorp.com.au
		3
Level A4 (1.5 - 3 Million Tonnes) PentAg Nidera Pty Ltd	Mr David Lengren	pentagnidera.com.au
Tentag Nidera Tty Etd	Wil David Lengten	pentaginuera.com.au 1
Level B1 (1.0 - 1.5 Million Tonnes)		
Bunge Agribusiness Australia Pty Ltd	Mr Chris Aucote	bunge.com/Agribusiness
Gavilon Grain Australia Pty Ltd	Mr Matt Albion	gavilon.com
Louis Dreyfus Australia	Mr Phil Coffin	louisdreyfus.com.au
		3
Level B2 (500,000 - 1 Million Tonnes)	Nan Nacide OlDute	and oom or
George Weston Foods Limited	Mr Mark O'Brien	gwf.com.au
Inghams Enterprises Pty Limited	Mr Greg McDonald	inghams.com.au
Plum Grove Pty Ltd	Mr Tony Smith	plumgrove.com.au
Queensland Cotton Corporation Ltd	Ms Lucy Watson	qcotton.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
Arrow Commodities Pty Ltd	Mr Dominic Vanzella	arrowcom.com.au



Organisation	Contact	Website /Phone
Australian Grain Growers Co-operative Limited	Mr Steve Mellington	aggcoop.com.au
Centre State Exports Pty Ltd	Mr Jeff Voigt	centrestateexports.com.au
Chinatex (Aust) Wool Co Pty Ltd	Mr Jiling Lai	02 9957 2688
COPRICE	Mr Chris Nikolaou	coprice.com.au
JBS Australia Pty Limited	Mr Greg Kenny	jbsswift.com.au
Lempriere Grain Pty Ltd	Mr Jonathon 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	Mr Peter Burke	specialonegrain.com.au
Touton Far East Pte Ltd	Mr Justin Fay	touton.fr
United World Enterprises Pty Ltd	Mr Jimmy Liu	uwetypical.com
Wilmar Gavilon Pty Ltd	Mr Matt Albion	07 3713 8700
Ordinary Member (Trading)		14
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 Jack Vivers	agmark.com.au
Agri-Oz Exports Pty Ltd	Mr Francois Darcas	03 9830 7021
Agriex Australia Pty Ltd	Mr Kishore Bulchandani	02 9232 0690
Agrifoods Australia	Mr Rob Anderson	agrifoodsaustralia.com.au
AGRIGRAIN	Mr Jeremy Brown	agrigrain.com
Agripark	Mr John Randell	mgas.com.au/grainpacking
Allied Mills	Mr Joshua Lawrence	alliedmills.com.au
AMPS Agribusiness Group	Mr Stuart Maidment	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 Russell Greening	aumg.com.au
Australian Grain Export Pty Ltd	Mr Grant Roesler	08 8832 2800
Australian Grain Storage	Mr Matt Bailey	sunrice.com.au
Australian Growers Direct Pty Ltd	Mr Jamie Smith	graincorp.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
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 3720 1900
Boort Grain Co-Operative	Mr Tony Bellinger	03 5455 2600
Broun and Co Grain Marketing Services Pty Ltd	Mr Wally Broun	brounandco.com.au
· ·	Mr Brad Jones	
Bungulla Farming Pty Ltd	Mr Andrew Tremlett	08 9637 1164 08 8524 9050
C K Tremlett Pty Ltd		07 4671 4144
Cameron Pastoral Company Pty Ltd	Ms Ross Stephens	03 6221 8316
Castagets James Australasia Pty Ltd	Mr Roger Ibbott	
Castlegate James Australasia Pty Ltd	Mr Dominic Hogan	castlegatejames.com.au
CHS Trading Company Australia	Mr Jon Bucknall	chsinc.com.au
Cleveland Agriculture	Mr David Titterton	02 6756 5004

Ms Mariam Boulos

02 9531 7341

Commex International Pty Ltd



Organisation	Contact	Website /Phone
Coorow Seeds	Mr Brian Pover	coorowseeds.com.au
Cremer Australia Pty Ltd	Mr Brendan Macauley	cremer.de
D & M Stockfeeds	Mr Robert Danieli	dmstockfeeds.com.au
DA Hall and Co	Mr Bruce Holden	07 4695 5777
Dalby Bio-Refining Limited	Ms Leanne Pickard	dbrl.com.au
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	www.deckerts.com.au
Defiance Maize Products Pty Ltd	Mr Rodney Walker	corson.co.nz
Demeter Cormack Pty Ltd	Mr David Oates	08 6389 0098
East Coast Stockfeed Pty Ltd	Mr Stuart Dolden	ecsf.com.au
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
Fletcher International Exports Pty Ltd	Mr David Wheaton	fletcher-international.com.au
Free Eyre Grain Pty Ltd	Mr Mark Rodda	free-eyre.com.au
Gavan Kerr Commodity Services Pty Ltd	Mr Gavan Kerr	03 97 695 164
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 Sam Christensen	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.com.au
Greentree Farming	Mr David Brown	02 6751 1228
GrainTrend Pty Ltd	Mr Sanjiv Dubey	graintrend.com
Grenfell Commodities Pty Ltd	Mr Trevor Mawhinney	grenfellcomm.com.au
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
Holland's	Mr Michael Holland	hollandbt.com.au
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
J K International Pty Ltd	Mr Sandeep Mohan	jki.com.au
James Stock Feed and Fertilizer Pty Ltd	Mr Adrian Moule	jamesstockfeed.com.au
Jerilderie Grain Storage & Handling	Mr David Barlow	03 5886 0344
K M & W M Kelly & Sons	Mr Chris Kelly	kellygrains.com.au
Kangaroo Island Pure Grain Pty Ltd		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
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 Shane Taunton	07 3253 5999
LPC Trading Pty Ltd	Mr Simon Langfield	02 6383 7222
Mahony's Transport Services	Mr Anthony Foster	mahonystransport.com.au
Malteurop Australia Pty Ltd	Mr Jack King	03 5277 1950



Organisation	Contact	Website /Phone
Mars Petcare Australia	Mr Mark Torrens	mars.com
Marubeni Australia Ltd	Mr Tom Tokunaga	marubeni.com
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
Moore Bulk Storage	Mr Daryl Moore	moorestorage.com.au
Moulamein Grain Co-Operative Ltd	Mr Tony Bellinger	moulameingrain.com
Mountain Industries Pty Ltd	Mr Kevin Bennett	mountainindustries.com.au
MSM Milling Pty Ltd	Mr Peter MacSmith	02 6364 5999
Murrumbidgee Grains Pty Ltd	Mr Peter Hassell	02 6937 9100
Namoi Cotton Co-Operative	Mr Shane McGregor	namoicotton.com.au
Nandaly Grain Co-Operative Ltd	Mr Tony Bellinger	03 5078 1217
Newcastle Agri Terminal Pty Ltd	Mr Jock Carter	02 4962 4006
Nhill Bulk Handling	Mr Michael Purchase	nhillbulk.com.au
Noble Resources Australia Pty Ltd	Mr Ian Dalgleish	thisisnoble.com
Northern Riverina Grains Pty Ltd	Mr Tony Bellinger	03 5032 2553
Oakey Holdings Pty Ltd	Mr Gino De Stefani	oakeyholdings.com.au
OOMA Enterprises NSW Pty Limited	Mr Malcolm Berry	oomaenterprises.com.au
Origin Grain Pty Ltd	Mr Luke Mancini	02 9331 2711
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
Pentarch Grain Pty Ltd	Mr David Hanrahan	pentarch.biz
Peters Commodities Pty Ltd	Mr Michael Oxley	petcom.com.au
Phoenix Commodities (Australia) Pty Ltd	Mr Jogesh Virk	07 35 537 111
Preston Grain	Mr Andrew Kell	02 6977 1733
Premium Grain Handlers P/L	Mr John Orr	pgh.com.au
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
R V Broadbent & Sons	Mr Geoff Barker	rvbroadbent.com
Redrock Corporation (NSW) Pty Ltd	Mr Jason Tetley	0418 866 843
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 Joe Fealy	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 Bill Baxter	rurallogic.com.au
SANWA Pty Ltd	Mr Charles Emerson	sanwa.com.au
Seedhouse Tasmania	Mr Matthew Crane	seedhouse.com.au
Shannon Bros Bulk Haulage	Mr Clayton Shannon	03 5390 2264
Silo Bag Grain (NSW QLD) Pty Ltd	Ms Lesley Kilby	02 6847 1788
Societa Cofica Pty Ltd	Mr Dia Ram Sharma	societacofica.com.au
Southern Cotton Trading Pty Ltd	Mr Chris Veness	02 69 552 779
Southern Grain Storage Pty Ltd	Mr Campbell Brumby	03 5267 2351
Southern Stockfeeds (Operations) Pty Ltd	Mr Brendan Maher	03 5437 8295
Starcom Grain Pte Ltd	Mr Ajay Aggarwal	+65 6336 7288
Sumitomo Australia Pty Ltd	Mr Tsuyoshi Osumi	sumitomocorp.com.au



Mem	bership List as at 17 April 2014	
Organisation	Contact	Website /Phone
Summer Hill Grains	Mr Barney Hughes	0428 694 363
Tamma Grains	Mr Kim Packer	tammagrains.com.au
Tasmanian Agricultural Producers Pty Ltd	Mr David Skipper	tasagproducers.com.au
Tasmanian Stockfeed Services P/L	Mr Trevor Macleod	tasstockfeed.com.au
Twynam Pastoral Company	Ms Ella Shannon	02 9325 9000
Unigrain Pty Ltd	Mr Ervin Leong	unigrain.com.au
W B Hunter Pty Ltd	Mr Stewart Coombes	03 5821 5744
Ward McKenzie Pty Ltd	Mr Mal Parkhill	mckenziesfoods.com.au
Whitty Produce	Ms Marsha McMonigle	03 5721 6588
Wilken Grain	Mr Richard Wilken	wilkens.com.au
Wimpak Export Company Pty Ltd	Ms Sarah Spicer	wimpak.com.au
XLD Grain Pty Ltd	Mr Lachie Stevens	xldgrain.com.au
		150
Transport Operator	W. J. P. G. L. I.	07.407.0007
Gehrke Grains and Transport Pty Ltd	Mr Julian Gehrke	07 5465 6695
Wakefield Grain Export Services	Mr Steve Fallon	wakefields.com.au 2
Broker		2
Large		0
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
FC Stone Australia Pty Ltd	Mr Brett Cooper	intlfcstone.com
Grainsplus NSW	Mr David Sykes	grainsplusnsw.com
Horizon Grain Brokers Pty Ltd	Mr Ash Munro	horizongb.com.au
ICAP Australia Pty Ltd	Mr Garry Booth	icap.com
Igrain.com.au Pty Ltd	Mr Tom Roberts	igrain.com.au
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
Wimmera Mallee Grain Services	Mr Rodney Edgerton	egrainservices.com.au
Broker (contd)		12
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
Link Brokering Pty Ltd	Mr Dion Costigan	03 5444 3295
Mallon Commodity Brokering	Mr Ian Mallon	mcbrokering.com
Shearwater International Pty Ltd	Mr Don Cattanach	07 3324 9088
Woodside Commodities Pty Ltd	Mr Hamish Steele-Park	woodcomm.com.au
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Corporate		
Large	My Dougol IIt	4. • 6.
ASX Limited	Mr Dougal Hunter	asx.com.au/grainfutures
Australia And New Zealand Banking Group	Ms Casey Morecroft	anz.com.au

Mr Michael Golden

commbank.com.au

mla.com.au

Commonwealth Bank of Australia

Meat & Livestock Australia Limited



Organisation	Contact	Website /Phone
"		4
Medium	Mr Bob McKay	agfann agn an
Agfarm Pty Ltd Agrifood Technology Pty Ltd	Ms Doreen Fernandez	agfarm.com.au 03 9742 0589
Agrisk Management Pty Ltd	Mr Brett Stevenson	02 9499 4199
Clear Grain Exchange	wir brett Stevenson	03 9514 9000
Commodity Inspection Services (Australia) Pty Ltd	Mr Mathew Conoulty	commodityinspection.com.au
Foss Pacific Pty Ltd	Mr Simon Kirkman	foss.com.au
Holman Fenwick Willan	Mr Stephen Thompson	hfw.com
Intertek	Mr Lee Shilvock	intertek.com
Macpherson + Kelley Lawyers	Mr Geoff Farnsworth	mk.com.au
SBA Law	Mr Jeremy Rosenthal	sbalaw.com
SGS Australia Pty Ltd	Mr James Saunders	
505 Australia I ty Liu	wir James Saunders	au.sgs.com 11
Small		
Ag Scientia Pty Ltd	Mr Lloyd George	03 9598 1980
Advance Trading Australasia	Mr Andrew Woodhouse	advance-trading.com.au
Agvise Management Consultants	Mr Shane Sander	08 9041 5992
Australian Superintendence Company	Mr Andrew Parry	07 3391 8640
AvantAgri Australia Pty Ltd	Mr Peter Woods	avantagri.com.au
CloudBreak Grain Marketing Pty Ltd	Mr Ed Scamps	08 8388 8084
Delta Agribusiness Pty Ltd	Mr Michael Parry	02 6772 0000
Direct Commodities Pty Ltd	Mr Hamish Robertson	directcommodities.com.au
Eyre Peninsula 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
Grain Storage Solutions	Mr Kerry Miles	grainstoragesolutions.com.au
HarvestCheck Pty Ltd	Mr Stephen Schumacher	0418 199535
IKON Commodities Pty Ltd	Mr Simon Clancy	ikoncommodities.com.au
Import-Export Services Pty Ltd	Mr Bob Ronai	02 9986 3000
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 David Earle	03 5862 2799
O'Halloran Deal Lawyers	Mr Anthony Deal	02 6971 0336
OMIC Melbourne	Mr Koji Nakashima	03 9326 4877
Perten Instruments Australia Pty Ltd	Mr Raul Ovelar	02 9979 6992
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
Ten Tigers	Mr Chris Tonkin	tentigers.com.au
J		31
ernational Affiliate		
CIS - Commodity Inspection Services	Mr Paul Schweitzer	cis-inspections.com
J I		1.5 mspections.com