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20 December 2019

Department of Agriculture, Water and the Environment GPO Box 858 Canberra ACT 2601 Email: Via Web

RE: Modernising the RDC System

Dear Sir/Madam,

I am writing regarding the call for submissions seeking ways to modernise and improve the Research and Development Corporation (RDC) system.

Grain Trade Australia (GTA) is a member of a Department of Agriculture, Water and the Environment's (DAWE) Grain and Plant Products Export Industry Consultative Committee (GPPEICC). GTA is the focal point for the commercial grain industry within Australia. It facilitates trade and works to provide an efficient, equitable and open trading environment by providing leadership, advocacy and commercial services to the Australian grain value chain. GTA is nonpolitical, industry driven with a primary focus to ensure the efficient facilitation of commercial activities across the grain supply chain including a strong focus on the logistics of grain through transport storage and ports.

GTA's has over 280 organisations as members ranging from regional family businesses to large national and international trading, storage and handling companies, grain marketers, consumers and processors. The vast majority of grain contracts executed in Australia refer to GTA grain trading standards, standard-form grain contracts and GTA Trade Rules. Most of Australia's grain storage and freight movements are made by GTA members. Key national and state producer representative groups are also GTA Members.

A list of GTA Members is attached.

1. Value of Australian Export Regulations

The Australian grain industry has a reputation as a reliable supplier of quality grain on the international market. This reputation is supported and enhanced by the export regulations as managed by DAWE to ensure grain meets importing country quarantine requirements.

2. Innovation is the Key

GTA agrees with DAWE that innovation is a key to the future prosperity of the agricultural sector and support the current structure of government and industry investing jointly in research and development (R&D) through RDCs as a means of investing collectively in innovation.

The government and industry target of achieving \$100 billion in annual gross value of production for the sector by 2030 arguably cannot be achieved without strategic investment in R&D.

3. Ernst and Young Innovation Report

DAWE recently commissioned Ernst & Young (E&Y) to develop a shared vision to best position the Australian agricultural innovation system for the future. GTA is of the opinion this report is instructive and provides a solid base for DAWE to consider modernising the RCDS.

In particular, GTA considers the section 'key insights from international research' to be relevant, provide direction and guidance in relation to innovation. Within this section of the report, and as summarised in Figure 1. is a discussion on the relevance of having a balanced focus across a number of specific key innovation focus area, including 'Commercialisation'.

Figure 1. Relative Positioning across key innovation focus areas

Research	Testing	Development	Commercialisation	Extension
Research evaluates scientific capabilities to generate new ideas	Testing considers the ability to trial proof of concepts	Development involves the translation of research and testing into practical solutions	Commercialisation considers whether innovation becomes a marketable product	Extension evaluates how well innovation reaches end users

The report also discusses the need to continue this balanced approach when considering the relative positioning across key influences on R&D investment and to ensure all influencers are considered. The key influencers are described in Figure 2. As adapted from the E&Y report.

Figure 2. Relative Positioning across key influencers on investment

Science-based R&D	Practical R&D	Priority stakeholder influence	National interests
Considers the impact of evidence-based research on decisions	Considers the availability of applicable solutions impacts decisions and delivering key outcomes	Innovation is influenced by key parties in powerful positions	Innovation is guided by national interests

The grain industry operates under a self-managed model that requires a balanced industry approach to issues that consider the production sector, commercial grain traders, supply chain service providers, end users (international & domestic) and government departments and agencies. The report considers a balanced approach to R&D is also applicable.

GTA recommends DAWE review and where appropriate consider implementing the Report recommendations whilst ensuring the RDCs scope includes a whole of supply chain view.

4. R&D – Whole of Supply Chain

As part of this review to modernise RDCs and to drive innovation there must be a 'whole of supply chain' view. This is critical in the grain industry as value is both generated and lost from initial soil preparation through to delivery to the final customer. Around 30-35% of producer's overall costs are incurred in the supply chain from farm to end-use consumer.

Grain producers more than ever can extract and capture value from the post farm gate supply chain. The emergent post 'single desk' Australian grain supply chain in most states is running counter to the global trend of supply chain consolidation. The grain supply chain is increasing its warehouse capacity and the number of operators through multiple container packers, new ports, country storage operators and farm-based storage and logistical enterprises.

The historical consolidated supply chain maintained by large Bulk Handling Companies (BHCs) is evolving into a competitive mix of on-farm storage and commercial storage operators operating in an increasingly dynamic and entrepreneurial market. This increasingly competitive and spatially distributed storage model provides opportunity and rewards for participants. However, whilst delivering benefit a broad and competitive multi-business storage model, (where the maintenance and logistics of grain is controlled by many parties) does require guidance and support if Australia is to maintain the well- deserved reputation in the world market that has been developed over many years.

R&D along the whole supply chain driving increased innovation, investment and assurance management processes and systems will assist the grain industry to contribute to the government and industry target of achieving \$100 billion in annual gross value of production for the sector by 2030.

Investment in R&D within the whole of supply chain will also address a future gap emerging in industry processes and innovation. Previously the BHCs, due to scale had provided guidance and numerous industry management processes to industry participants. The industry must re-assess and re-design to create a whole of value chain assurance system based on the emerging storage model.

Exciting technology and data management opportunities are fast becoming available that may potentially facilitate seamless transfer of data through the emerging supply chain. However, to generate the most benefit a systemic and managed approach to analysing and determining a unified approach to innovation and opportunities is required. This may be best managed through Public and Public/Private partnerships that:

- 1. Designs appropriate supporting technology and/or management process;
- 2. Consults and determine the framework; and
- **3.** potentially collectively invest in pre-competitive technology.

There are numerous precedents for public investment in development of pre-competitive activities including the Internet Wi-Fi, and transport and infrastructure.

GTA currently has several opportunities it considers of value and worth review and no doubt other industry participants also have great and innovative ideas that would benefit from some government stewardship and leadership and collective investment.

The modernising of RCDS may be the circuit breaker that industry requires to enable and proactively drive innovation and generate the ideas that promote growth and achievement of the 2030 target of \$100 billion dollars of annual gross value production.

For your information, GTA has reviewed the question of 'modernising RCDs' through its Technical Committee structures.

Thank you for this opportunity to comment. Please do not hesitate to contact GTA at any stage to discuss further.

Yours faithfully,

OSL

Pat O'Shannassy CEO, Grain Trade Australia

GRAIN TRADE AUSTRALIA

Membership List as at 13 December 2019

Organisation	Contact	Website /Phor
nary Member (Trading)		
Level A1 (over 7 Million Tonnes)		
CBH Grain Pty Ltd	Mr Jason Craig	cbh.com.a
Glencore Agriculture Pty Ltd	Mr Philip Hughes	glencoreagriculture.com.a
Level A2 (5 - 7 Million Tonnes)		
Graincorp Operations Ltd	Mr Klaus Pamminger	graincorp.com.a
Level A3 (3 - 5 Million Tonnes)		
ADM Trading Australia Pty Ltd	Mr Darryl Borlase	adm.co
Cargill Australia Limited	Mr Erik Wibholm	cargill.com.a
		cargin.com.
Level A4 (1.5 - 3 Million Tonnes)		
Level B1 (1.0 - 1.5 Million Tonnes)		
Arrow Commodities Pty Ltd	Mr Dominic Vanzella	arrowcom.com.a
Emerald Grain Pty Limited	Mr David Johnson	emeraldgrain.co
Cofco International	Ms Sara Pan	cofcoagri.com.
Level B2 (500,000 - 1 Million Tonnes)		
Australian Grain Export Pty Ltd	Mr Brett Dodson	australiangrainexport.com.
CHS Broadbent Pty Ltd	Mr Steve Broadbent	broadbentgrain.com.a
Centre State Exports Pty Ltd	Mr Jeff Voigt	centrestateexports.com.
George Weston Foods Limited	Mr Mark O'Brien	gwf.com.
Ridley Agriproducts Pty Ltd	Mr Michael Reeves	agriproducts.com.
Riordan Grain Services	Mr Mark Lewis	riordangrains.com.
Riverina (Australia) Pty Ltd	Mr Gareth Stapleton	riverina.com.
Bunge Agribusiness Australia Pty Ltd	Mr Stephen Bennett	bunge.com/agribusine
Level B3 (250,000 - 500,000 Tonnes)		
Agfarm Pty Ltd	Mr Ron McCalman	agfarm.com.
Agracom Pty Ltd	Mr Joe Hallman	agracom.com.a
Agrisk Management Pty Ltd	Mr Brett Stevenson	02 9499 41
Allied Pinnacle Pty Ltd	Mr Josh Lawrence	alliedpinnacle.co
Robinson Grain Trading Co Pty Ltd	Mr Gary Robinson	robinsongrain.com.
Wilmar Gavilon Pty Ltd	Mr Matt Albion	07 3713 870
Louis Dreyfus Company Australia Pty Ltd	Mr Sam Roache	louisdreyfus.com.
Quadra Commodities Pty Ltd	Mr Robin Cassar	quadra.co

Ordinary Member (Trading) Level C (under 250,000 Tonnes) A T Waterfield & Son Pty Ltd A W Vater and Co AACL Ptv Ltd Access Grain Pty Ltd Adams Australia Pty Ltd Agmark Commodities Agri Om Australia Pty Ltd Agri-Oz Exports Pty Ltd Agriex Australia Pty Ltd Agrifoods Australia Agrigrain Agromin Australia Pty Limited AGT Foods Australia Associated Grain Auscott Ltd AusiCan Commodities Australian - Asian Agricultural Exports Pty Ltd Australian Choice Exports Pty Ltd Australian Fresh Milk Holdings (AFMH) Australian Grain Storage Australian Growers Direct Pty Ltd Australian Mungbean Company Pty Ltd Australian Storage Alliance Pty Ltd Baker Grain BFB Pty Ltd **Blairs Produce Company** Boolah Grains Ptv Ltd Boort Grain Co-Operative Broun and Co Grain Pty Ltd C & S Trading Pty Ltd C K Tremlett Pty Ltd **Carpendale** Commodities Cameron Pastoral Company Pty Ltd Castlegate James Australasia Pty Ltd CL Commodities Pty Ltd Continental Grain Handling Pty Ltd (CGH) Coorow Seeds Coprice Cremer Australia Pty Ltd Dalby Bio-Refining Limited Darwalla Milling Co Pty Ltd Deacon Seeds Company Deckert Group Pty Ltd Defiance Maize Products Pty Ltd Demeter Cormack Pty Ltd Direct Commodities Pty Ltd Donnellons Bulk Haulage Pty Ltd East Coast Stockfeed Pty Ltd **Elders Grain** Ellerslie Free Range Farms Pty Ltd

Level C (under 250,000 Tonnes) cont.

Esperance Quality Grains Export Trading Group Australia Pty Ltd Feed Central Pty Ltd Mr Brad Waterfield Mr Kim Vater Mr Simon Gellert Mr Wade Humphreys Mr Ian Mack Mr Richard Alcorn Mr Kishore Bulchandani Mr Francois Darcas Mr Joseph Khnessier Mr Rob Anderson Mr Jeremy Brown Mr Raini Patel Michael Brittain Mr Bhuvan Gandhi Mr Peter Webb Mr Douglas Saunders Mr Mick Connolly Mr James Hunt Ms Jill Smith Mr Matt Bailey Mr Tom Lucas Mr Damien White Mr Jon Bucknall Mr Richard Baker Mr Terry Brabin Mr Sean Blair Mr Stuart Tighe Mr Jon Bucknall Mr Wal Broun Mr Craig Scholz Mr Andrew Tremlett Mr Andrew Kluck Mr Ken Cameron Mr Ross Giovanetti Mr Robert Lean Mr Rick Guo Mr Brian Pover Mr Lyndon Benecke Mr Scott Haughton

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Mr Lachlan Allen Mr Bruce Holden

Mr Neil Wandel Mr Shayne Clark Mr Tim Ford

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Level C (under 250,000 Tonnes) cont.

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Corporate

Large

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

Medium

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Mr Jeff Winspear

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Mr Kieran Carvill

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Ms Katrina Saunderson

Mr Rodney Edgerton

Mr Hamish Steele-Park

Mr Angus Wettenhall

Mr Craig Perkins

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Small

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International Affiliate

CCIC Australia Pty Ltd CIS - Commodity Inspection Services

Industry Association

Australia Export Grain Innovation Centre Grain Growers Limited Grain Industry Association of WA Grain Producers Australia Ltd NSW Farmers Association Victorian Farmers Federation Mr Ed Scamps Mr Michael Parry Ms Tracey Lehmann Mr Donald McTaggart Mr Robert Imray Mr Malcolm Finlayson Mr Jarrod Tonkin Mr Geoff Webb Mr Lucas Anstiss Mr Chris Hood Mr Stephen Schumacher Mr Ron Harris Mr Peter McMeekin Mr Ole Houe Mr Lachie Stevens Mr Mark Martin Mr Gerard McMullen Mr Scott Still Mr Adam Davis Mr Mark Murphy Ms Debbie Newmarch Mr Yasuhide Okumura Mr Raul Ovelar Mr Rod Buckle Mr Jerome Critch Mr Mark Sloan Mr Peter Longhurst Ms Hannah Janson Mr Ian Dalgliesh Mr Chris Heinjus Mr Robert Ford Mr David Hudson Mr Tom Hage Mr Chris Tonkin Jon Bucknall

Mr Isherwood Feng Mr Paul Schweitzer

Mr Richard Simonaitis D. McKeon Ms Larissa Taylor Mr Andrew Weidemann Ms Alexandra Bunton Ms Annabel Mactier

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Merchant Association

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Life Members

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