

19th May 2025

Department of Agriculture, Fisheries and Forestry
GPO Box 858
Canberra ACT 2601

Email: Via Web

Re: Department of Agriculture, Fisheries and Forestry Cost Recovery CRIS 2025-26

Dear Secretariat,

Grain Trade Australia (GTA) welcomes the opportunity to provide comment on the 2025-26 CRIS. This is particularly the case as GTA is concerned with the proposed and unexplained 25% cost increase in the grain export cost recovery (ECR) program in relation to grain export regulatory activities charged by the Department of Agriculture, Fisheries and Forestry (DAFF).

1. About GTA

Grain Trade Australia (GTA) is a member of the DAFF Grain and Plant Products Export Industry Consultative Committee (GPPEICC). GTA is a national association and 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 drawn from all sectors of the grain value chain from production to domestic end users and exporters. GTA has over 295 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.

As the exporters of grain from Australia, **it is GTA members who pay for** the grain export cost recovery (ECR) program.

2. Recent Grain Sector Performance

As a result of recent high grain production seasons, and subsequent large export volumes, the grain export cost recovery (ECR) program has exceeded budget over the last four seasons. DAFF reported in the beginning of the 2024-25 budget period a grain **ECR balance of \$5,477,856**. DAFF reported its expenses in the grain program during the prior two reporting periods were both approximately \$14m per annum.

It is critically important to consider the effectiveness and the application of the DAFF cost recovery model and the impact it has on the agricultural industry's efficiency. The grain industry operates under a globally competitive market and for Australian participants to be successful, an efficient, low cost and competitive operating environment is required including the provision of efficient government services.

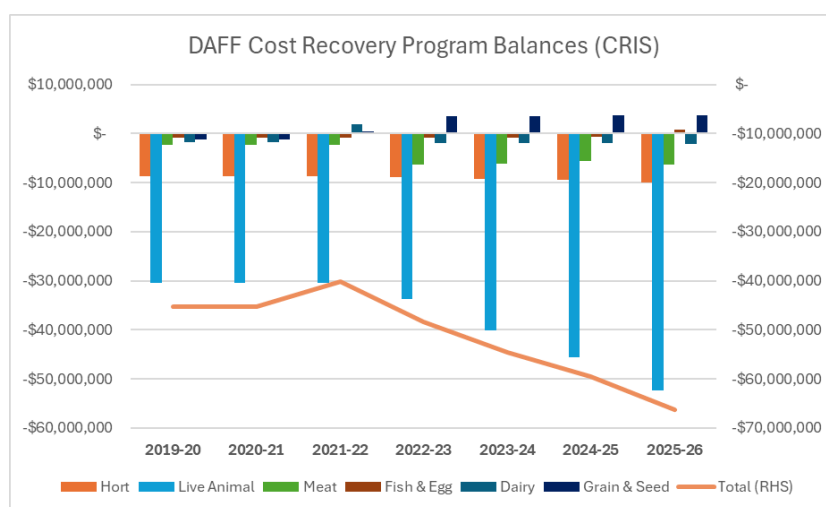
The grain industry has a strong view the CRIS cost recovery mechanism **must adhere to Government policy objectives**, including the key principles of **transparency and the provision of cost-effective services**.

3. DAFF Cost Recovery Effectiveness

The grain industry has supported ECR charges on the basis that DAFF should be accountable to industry for the efficient use of these funds and the funds should only be utilised for the purpose on which they are collected or for the benefit of the group (i.e. grain exporters) from which they were charged and collected.

As illustrated in Figure 1 below, other agricultural commodity sectors Reserve Balances are substantially negative and the reported parlous state of DAFF's finances over recent years, the grain industry remains concerned the ECR is not well managed, and funds are not efficiently utilised. GTA is also concerned the grain ECR may potentially receive a disproportionate cost allocation for services received relative to other commodity sectors. An example is the disproportionate allocation of costs to grain ECR that occurred with the allocation of Ag Counsellor costs at the end of FY2023-24.

Figure 1. Performance by Sector – DAFF Cost Recovery



GTA members may be negatively impacted due to the negative reserve balances of the other agricultural sectors. For example, there have been occasions DAFF have introduced broad cost restraints across all sectors (e.g. travel restraints) because of budget overruns and negative results in other sectors.

It is understood the agricultural sectors that are in a negative balance may have their deficit and cost increases reduced by Government appropriation funding. Whereas the grain sector may be required to draw on its reserves to fund the \$4m ECR increase. This is hardly consistent with the principle of “socialising” the costs running DAFF, and attributing costs to where they are incurred, as clearly some sectors pay through cost recovery, while others do not.

4. Unexplained Increase in forecast DAFF Expenses

Reports at recent GPPEICC meetings and in this 2025-26 CRIS indicate an annual cost for DAFF **expenses for the grains sector of \$18m, an increase of 25%** (reported in this CRIS as mainly a result of a 19% increase in labour). This \$18m cost is compared to the 2 prior year actual DAFF expenses of \$14m. This increase in labour cost would seem to be greater than the CPI type of pay increase across the Public Service.

The increase of \$4m for FY 2024/25 and now also documented in the 2025/26 CRIS, **has been questioned extensively at GPPEICC meetings** and industry still have not received an adequate explanation from DAFF.

It is also somewhat counter intuitive that the grain sector that has been building reserves across large production seasons, is now being hit with ECR cost increases in smaller production seasons when demand for service will be lower. This is a clear decline in productivity.

Whilst other sectors have also had increases in expenses including staffing, GTA questions the 25% increase applied to grain. We again ask that DAFF provide details on how it arrived at this number given the majority of the DAFF cost as described in the CRIS as labour.

4. In Summary

It is important to consider the effectiveness and the application of the DAFF cost recovery model and the impact it has on the agricultural industry's efficiency.

An efficient and effective DAFF is important to support market access for the grain industry. This includes the ability to apply this cost recovery mechanism so that it adheres to Government policy objectives and provides benefit to the export sector as well as being **equitable across commodity sectors**.

GTA supports cost recovery as a mechanism to provide key services not covered through Government consolidated revenue, however this is based on being provided with access to information and engagement with DAFF to ensure satisfaction the cost is balanced by the provision of an effective and efficient service.

Intuitively, we would expect a lower ECR cost in smaller grain export seasons relative to the recent larger export seasons. Transparency is critical to the CRIS process and GTA respectfully request a detailed explanation regarding the 25% cost increase.

Thank you for this opportunity to comment on the 2025-26 CRIS.

Please do not hesitate to contact GTA at any stage to discuss further.

Yours faithfully,



Pat O'Shannassy
CEO, Grain Trade Australia



GRAIN TRADE AUSTRALIA

Membership List as of 8 May 2025

Member Type	Member Level	Account Name	Primary Contact	Website
Ordinary Member	A1	CBH Group	Ben Macnamara	www.cbh.com.au
		GrainCorp Australia	Robert Spurway	www.graincorp.com.au
		Viterra Australia	Philip Hughes	www.viterra.com.au
			3	
	A3	Cargill Australia	Zsolt Kocza	www.cargill.com.au
			1	
	A4	ADM Trading Australia	Darryl Borlase	www.adm.com
		Australian Grain Export Pty Ltd	Tim Martin	www.australiangrainexport.com.au
		Bunge Agribusiness Australia	Stephen Bennett	www.bunge.com
		Louis Dreyfus Company Emerald Australia	David Johnson	www ldc.com
			4	
	B1	Arrow Commodities	Dominic Vanzella	www.arrowcom.com.au
		CHS Broadbent	Steve Broadbent	www.broadbentgrain.com.au
		George Weston Foods	Michael Schmidt	www.gwf.com.au
		Manildra Group	Peter Sloan	www.manildra.com.au
		Riordan Grain Services	Jim Riordan	www.riordangrains.com.au
			5	
	B2	Centre State Exports	Jeff Voigt	www.centrestateexports.com.au
		ETG Commodities	Peter McMeekin	www.etgworld.com
		Inghams Enterprise Pty Ltd	Matt Clarke	www.ingham.com.au
		J K International Pty Ltd	Sandeep Mohan	www.iki.com.au
		Ridley Agriproducts	Reagan Stroud	www.agriproducts.com.au
		Riverina (Australia)	Jon Mulally	www.riverina.com.au
		Wilmar Trading (Australia) Pty Ltd	Matt Albion	www.wilmargavilon.com
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	B3	Allied Pinnacle	Brett Duczmal	www.alliedmills.com.au
		Brahman Commodities	Michael Aikman	www.brahmancommodities.com.au
		Cofco International Australia	Sarah Pan	www.cofcointernational.com
		Demeter Grains	Barry Mansfield	www.demetergrains.com.au
		K M & W M Kelly & Sons	Matt Kelly	www.kellygrains.com.au
		Quadra Commodities	Robin Cassar	www.quadra.com
		Qube Logistics (SB) Pty Ltd (T/A Qube Agri)	Jeremy Brown	www.qube.com.au
		Robinson Grain Trading	Adam Robinson	www.robinsongrain.com.au
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	C1	Agracom	Joe Hallman	www.agracom.com.au
		Agrisk (Market Check)	Brett Stevenson	www.marketcheck.com.au
		AGT Foods Australia	Michael Brittain	www.agtfoods.com/australia
		Associated Grain t/a Agroporc Processing Australia	Russell Darbey	www.agrocorp.com.au
		Australian Food & Fibre Processing	Peter Webb	www.australianfoodandfibre.com.au
		Australian Fresh Milk Holdings (AFMH)	Jill Smith	www.afmh.com.au
		BFB Pty Ltd	Shane Bird	www.bfb.com.au
		Blairs Produce Company	Sean Blair	crt.com.au/store/blairs-produce-company/
		Boolah Farms Pty Ltd	Stuart Tighe	www.boolah.com.au
		Castlegate James Australasia Pty Ltd	Kevin O'Brien	www.castlegatejames.com.au
		COPRICE	Hugo Steinfert	www.coprice.com.au
		Darwalla Milling Co Pty Ltd	Gary Heidenreich	www.darwalla.com.au
		DDT Holdings	Rajeev Saraff	www.ddtholdings.com.au
		Deckert Group Pty Ltd	Chris Deckert	www.deckerts.com.au
		Esperance Quality Grains Pty Ltd	Neil Wandel	www.esperancequalitygrains.com
		Fletcher International Exports	Joe Masters	www.fletchintl.com.au
		Fodder Link Pty Ltd	Cameron Angel	www.fodderlink.com.au
		Hanlon Enterprises	Chris Coates	www.hanlonenterprises.com.au
		Hazeldenes Chicken Farm	Marcus Dingle	www.hazeldenes.com.au
		IGH Commodities	Brad Bryant	www.igh.net.au
		Inari Australia	Karan Singh	www.inariaustralia.com.au
		Irwin Stockfeeds	Bryan Irwin	www.irwinstockfeeds.com.au
		Itochu Australia Ltd	Ayush Rajvanshi	www.itochu.com.au
		Jerilderie Grain Storage & Handling	David Barlow	www.jgsh.com.au
		Laucke Flour Mills Pty Ltd	Roger Laubsch	www.laucke.com.au
		Lawson Grains	John Marshall	www.lawsongrains.com
		LPC Trading Pty Ltd	Simon Langfield	www.lpc trading.com.au
		Malteurop Australia Pty Ltd	Eric Fisher	www.malteurop.com/en/australia
		MC Croker	Jason McPherson	www.crokergrain.com.au
		MSM Milling Pty Ltd	Peter MacSmith	www.msmmilling.com.au
		Namoi Cotton Ltd	Nathan Hunter	www.namoicotton.com.au
		Pentarch Agricultural Pty Ltd	James Whiteside	www.pentarch.com.au
		Premium Grain Handlers P/L	John Orr	www.pgh.com.au
		Queensland Cotton Corporation	Ashish Govil	www.qcotton.com.au
		Reid Stockfeeds Pty Ltd	Ian Reid	www.reidstockfeeds.com.au
		Rex James Stockfeed	Natasha Davies	www.jamesstockfeed.com.au
		Rivalea (Australia) Pty Ltd - Animal Nutrition	Andrew Philpotts	www.rivalea.com.au
		Riverina Oils & Bioenergy	Krissy Campbell	www.riverinaoils.com
		SunPork Farms Feed Mills	Mark Young	www.sunporkgroup.com.au
		Thompson & Redwood Pty Ltd	Stephen Lamond	
		ThriveAgri Pty Ltd	Charlie Brown	www.thriveagri.com
		TSS Grain (Tasmanian Stockfeed Services)	Trevor Macleod	www.tasstockfeed.com.au
		Unigrain Pty Ltd	Ervin Leong	www.unigrain.com.au
		Viridis Ag	Chris Reeves	www.viridisag.com
		W B Hunter Pty Ltd	Stewart Coombes	www.wbhunter.com.au
		Wilken Grain	Richard Wilken	www.wilkens.com.au
		Woods Grain Pty Ltd	Bruce Woods	www.woodsgrain.com.au
		XLD Commodities	John Tuskin	www.xldgrain.com.au
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	C2	Access Grain Pty Ltd	Wade Humphries	www.accessgrain.com.au
		Adams Australia Pty Ltd	Ian Mack	www.adamsaustralia.com.au
		Aditi UVG	Harshad Kale	www.aditivg.com
		Aditya Birla Global Trading (Australia)	Surya Jain	www.abgtrading.com
		Advantage Grain Pty Ltd	Chris Nikolaou	www.advantagegrain.com.au
		Ag Connex Pty Ltd	Geoff Barker	www.agconnex.com.au
		Agmark Commodities	Richard Alcorn	www.agmark.com.au
		Agri Om Australia Pty Ltd	Kishore Bulchandani	www.agriom.com.au
		Agri-Oz Exports (Aust) Pty Ltd	Francois Darcas	linkedin.com/in/francois-darcas-4a440577
		Agromin Australia Pty Ltd	Rajni Patel	www.agromin.com.au
		Alliance Grains	Luke Walker	www.alliancegrains.com.au
		Arya Pulses Australia Pty Ltd	Aravindhan Ravindraraj	www.aryapulses.com.au
		A T Waterfield & Son Pty Ltd	Brad Waterfield	linkedin.com/in/brad-waterfield-8767869b
		Australian - Asian Agricultural Exports (AAAX)	Mick Connolly	www.aaax.ws
		Australian Choice Exports Pty Ltd	James Hunt	www.australianchoiceexports.com.au
		Australian Grain Storage	Matt Bailey	www.sunrice.com.au

		Australian Growers Direct Pty Ltd	Tyrone Stowers	www.ausgrowersdirect.com.au
		Australian Mungbean Company Pty Ltd	Damien White	www.australianmungbean.com.au
		A W Vater & Co	Kim Vater	www.vater.com.au
		Baker Grain	Richard Baker	www.bakergrain.com.au
		Boort Grain Co-Operative	Jon Bucknall	www.boortco-op.com.au
		Broun & Co Pty Ltd	Charles Coventry	www.brounandco.com.au
		C & S Trading Pty Ltd	Craig Scholz	www.scholzsh.com.au
		Carpendale Agri Pty Ltd	Andrew Kluck	www.carpendale.com.au
		Carson Stockfeed Pty Ltd	John Carson	03 6634 7376
		Chester Commodities	Richard Black	www.chestercommodities.com.au
		C K Tremlett Pty Ltd	Andrew Tremlett	linkedin.com/in/andrew-tremlett-36a06385
		CL Commodities	Robert Lean	www.clcommodities.com.au
		Coorow Seeds	Brian Pover	www.coorowseeds.com.au
		Cory Johnston (Aust) Pty Ltd	Alicia Dolan	www.coryjohnston.com.au
		Defiance Maize Products Pty Ltd	Rodney Walker	www.corson.co.nz
		Direct Commodities	Hamish Robertson	www.directcommodities.com.au
		DSL Pacific	Katarina Lindkvist	https://www.dslpacific.com/
		East Coast Stockfeeds	Stuart Dolden	www.ecsf.com.au
		Ellerslie Free Range Farms Pty Ltd	Maria Sue-Tin	www.dahall.com.au
		ETG Processing Pty Ltd T/A Wimpak	Brock Tait	www.wimpak.com.au
		Excel Farms	Nicholas Paterson	www.excelfarms.com.au
		Export Import Australia	Dhanesh Kumar	www.exportimportaustralia.com.au
		Export Trading Group Australia Pty Ltd	Shayne Clark	www.etgworld.com
		Fanmac Logistics Pty Ltd	Chris Fanning	www.fanmacag.com.au
		Feed Central Pty Ltd	Tim Ford	www.feedcentral.com.au
		Findlays Barellan	Neil Findlay	www.findlay.world/about-us
		Gold Star International Pty Ltd	Abhishek Kotkar	www.goldstarinternational.com.au
		Grainforce Pty Ltd	Stella Larnach	www.grainforce.com
		Grain Link WA Pty Ltd	Andrew Goyder	www.grainlink.com.au
		Grenfell Commodities Pty Ltd	Glenn Beasley	www.grenfellcomm.com.au
		GV Grain & Fodder	Joanne Harry	linkedin.com/in/joanne-harry-707119116
		Harwood Grains & Stockfeeds	Paul Harwood	www.harwoodgrains.com.au
		Horizon Commodities Pty Ltd	Aaron Jones	www.horizoncommodities.com.au
		HX Food Group (Aus) Pty Ltd	Dong Zhao	www.hxfoodgroup.com.au
		Jatlee Australia	Sunil Kumar	www.jatleecorp.com
		JH Grain Pty Ltd	Geoff Zhou	www.jhgrain.com.au
		J W Koek & Company	Brian Algate	07 3341 4548
		Kangaroo Island Pure Grain	Emma Tonkin	www.kipuregrain.com
		KB Agri Services Pty Ltd	Karl Bliss	linkedin.com/in/karl-bliss-916bb679
		Kennett Rural Services Pty Ltd	Andrew Kennett	www.kennett Rural .com.au
		Lachlan Commodities Pty Ltd	Tony Cogswell	www.lachlancommodities.com
		Lane Grain Pty Ltd	Garry Lane	linkedin.com/in/gary-lane-82635b88
		Mahonys Transport Services	Luke Mahony	https://www.mahonystransport.com.au
		Mallon AgCommodities	Blake Mallon	mallonag.com.au
		Mandala Trading	Jay Saraff	www.mandalatradng.com.au
		Marina Commodities (Australia)	Palwinder Singh	www.marina.commodities.com
		Matthews Transport and Grain Traders	Neville Matthews	linkedin.com/in/neville-matthews-aa592191
		Max Grains Pty Ltd	Jack Fahy	www.maxgrains.com.au
		Mckenzie Ag Services	Lachlan Mckenzie	www.mckenzieag.com.au
		McNaughts Grain & Fertilizer Pty Ltd	Daniel Mcnaught	www.mcnaughts.com
		Melaluka Trading Pty Ltd	Simon Pritchard	www.melalukatradng.com.au
		Melco Pty Ltd	Steve Mellington	www.melco.com.au
		Nandaly Grain Co-Operative	Jon Bucknall	www.nandalyco-op.com.au
		Network Grains Pty Ltd	Craig Dennis	www.networkgrains.com.au
		Norco	Jaco Van der Merwe	https://www.norco.com.au/agrisolutions/grain-team.php
		Northbound Trading Pty Ltd t/a WA Lupins	Daniel Marshall	www.walupins.com.au
		Origin Grain Pty Ltd	Marcus Currie	www.origingrain.com
		Outlook Commodities	Dominic Hogan	https://facebook.com/Outlookcommodities
		Pacific Global Sprouts Pty Ltd	Prashant Kewlani	www.pacificglobalsprouts.com
		Parkinson Bros	Rohan Parkinson	linkedin.com/in/rohan-parkinson-a76a761b4
		PB Seeds	Peter Blair	www.pbseeds.com.au
		Pearson's Grain	Darren Pearson	www.pearsonsgroup.com.au
		Peters Commodities	Michael Oxley	www.petcom.com.au
		Pinnacle Grains Pty Ltd	Sonal Vij	www.pinnaclegrains.com.au
		Plum Grove	Rikki Foss	www.plumgrove.com.au
		Pure Grain Network Pty Ltd	Stuart Tighe	www.puregrain.com.au
		QS Commodities Pty Ltd	Nick Slipper	www.gscommodities.com
		RP Grain Pty Ltd	Gordon Pulham	randpcarriers.com.au/r-p-grains
		Rural Logic (Aust) Pty Ltd	Michael Wood	www.rurallogic.com.au
		Shannon Bros Bulk Storage Pty Ltd	Clayton Shannon	www.shannonbros.com.au
		Silo Bag Grain (NSW QLD) Pty Ltd	Lesley Kilby	www.silobaggrain.com.au
		Societa Cofica	Dia Ram Sharma	www.societacofica.com.au
		Southern Grain Pty Ltd	Tim Gross	www.southernstockfeeds.com.au
		Southern Grain Storage Pty Ltd	Campbell Brumby	www.southerngrains.com.au
		Spagicon Australia	Jiger Kotecha	www.spagicon.com.au
		Standard Commodities Australia Pty Ltd	Elizabeth Bozinoska	www.stancom.com.au
		Sudima Australia	James Garvey	www.sudima.com
		Sun Euro Australia	Tarun Saxena	www.suneuro.com.au
		Sunny Trading Group	Tony Nguyen	https://sunnytradegroup.com.au/
		Tamma Grains Australia Pty Ltd	Kim Packer	www.tammagrains.com.au
		Tiller Commodities Pty Ltd	Brett Cooper	www.tillercommodities.com
		TRC International	Yohan Goonetilleke	www.trcglobal.com.my
		Trentham Grazing Pty Ltd (t/a Godde's Grain & Fertiliser Pty Ltd)	Barry Fisher	www.goddesgrainandfertiliser.com.au
		UluPna Pastoral Co Pty Ltd	Carly-Lee Perkins	www.ulupna.com.au
		Ulusoy Asia Pacific	Muhammet Genc	www.ulusoyflour.com
		Universal Commodity Management	Tim Dean	www.commoditymanagement.com.au
		Ward McKenzie	Greg Howe	www.mckenziefoods.com.au
		Waterfall Australia	Ian Mallon	ian@waterfallaustralia.com.au
		Watsons Bulk	Joel Watson	www.wbl.net.au
		WHG Oceania Pty Ltd	Gesheng Shen	shen@tqaj.cn
		Wirrinour Transport & Trading	Karl Hendy	www.wirrinourtransport.com.au
		Wycheproof Grain Handling	Bayden Durie	www.wychegrain.com.au
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Transport Operator		Crawfords Freightlines Pty Ltd	Phillip Davis	www.crawfordsfreightlines.com.au
		Gehrke Grains & Transport Pty Ltd	Julian Gehrke	www.gehrke.com.au
		Hamilton Contracting (NSW) Pty Ltd	Jodie Hamilton	www.hamiltoncontracting.com.au
		Horne Ag Logistics Pty Ltd	Jeremy Horne	www.horneaglogistics.com.au
		Pacific National (NSW) Pty Ltd	Paul Scurrah	www.pacificnational.com.au
		SEAWAY Intermodal Pty Ltd	Bikash Ram	www.seawayintermodal.com.au
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Broker	Medium	Fox Commodities Pty Ltd	Paul Cochrane	www.foxcommodities.com.au
		Grain Brokers Australia	Jeff Winspear	www.grainbrokers.com.au
		Horizon Grain Brokers Pty Ltd	Ash Munro	www.horizongb.com.au
		Quest Commodities	Jayne Barker	www.questcommodities.com.au
		Rain Agribusiness	Ian Grellman	www.rainag.com.au
		StoneX Financial	Stefan Meyer	www.intlfcstone.com
		Teague Australia Pty Ltd	Tim Teague	www.teague.com.au

