

25<sup>th</sup> June 2025

Ms. Courtney Simpson  
Executive Officer  
**Department of Natural Resources and Environment Tasmania**  
GPO Box 44 HOBART Tasmania 7001

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**Re: Submission – GMO Environmental Scan**

Dear Courtney,

Grain Trade Australia (GTA) welcomes the opportunity to provide comment on the Tasmanian Government's *Genetically Modified Organisms (GMO) Environmental Scan (Scan)*. The Scan provides an excellent overview of opportunities / issues and current sentiment towards Gene Editing and its benefits for primary industry sectors.

**1. Grain Industry Competitiveness**

It is important to be aware that the Australian grain industry's profitability, competitiveness and sustainability has been based on continual innovation and adoption of new technologies.

Crops developed through innovative breeding technology are one such technology that have significant potential to create productivity and market opportunity and growth. GTA is actively involved in industry discussions on plant breeding innovation via its membership of the International Grain Trade Coalition (IGTC) and domestically via the GTA Technical Committee on *Plant Breeding Innovation* that brings together representatives from across the Australian grain and seed value chain.

GTA works with the Australian grain industry to ensure that it has access to and implements systems and processes to maintain choice and ensure that regulatory and customer requirements in domestic and export markets can be met.

**2. 2022 Submission – Biosecurity Impact**

In 2022, GTA provided a [Submission](#) into the proposed Tasmanian Government proposal to deal with SDN-1 modified organisms as a *biosecurity impact* in Tasmania. It was noted in the submission this was perceived as a misuse of biosecurity settings and would set an adverse precedent as Governments and industry elsewhere did not consider this to be a biosecurity issue. The submission also noted that this approach would reduce choice to farmers and markets.

GTA's stated position in that submission was that grain derived from plants that have been developed from SDN-1 should not be described in the Biosecurity Regulations 2022 as a biosecurity issue.

**3. Key Findings of the Environmental Scan**

GTA has reviewed the Terms of Reference for Tasmania's Gene Technology Policy and supports its requirement that **regular reviews are undertaken** of developments in gene technology, markets and consumer sentiment.

The Scan performed is to be complimented as it provides an excellent summary of consumer and international government sentiment on Gene Editing (GE) and Genetically Modified Organism (GMO). The paper discusses the differences between SDN-1 and other breeding techniques. Its analysis confirms sentiment towards SDN-1 has become relatively positive due to a wider understanding of the technique's close alignment to conventional breeding.

The learnings in this Scan highlight:

*“The continuing treatment in Tasmania of SDN-1 organisms as though they were GMOs runs counter to national and most international arrangements”*

It is also noted that the paper states “softer attitudes to gene editing (especially using SDN-1 techniques) compared to GMOs have been discerned among populations globally and this difference in attitude is also evident among Tasmanian primary industry peak and sectoral groups”.

GTA agrees with the Scan conclusion that a more precise delineation of which activities are GMO may be warranted. This Scan and subsequent review by the Tasmanian Government is important and should be performed with care and consideration.

GTA encourages the Tasmanian Government to consider alignment to the 2019 Australian Government decision to not regulate SDN-1 techniques on the basis the products from use of SDN-1 present the same risk as products developed through conventional breeding approaches.

This decision made through the Office of the Gene Technology Regulator gave the green light to **SDN-1** plants, as there is no ‘foreign’ DNA present in a SDN-1 edited plant.

In June 2025 Food Standards Australia New Zealand (FSANZ) approved updated definitions for genetically modified (GM) food in the Australia New Zealand Food Standards Code (the Code).

Following an extensive review definition for gene technology and new breeding techniques, the GM definitions have been modernised to address advances in gene technologies and maintain strong food safety protections.

FSANZ stated the new definitions reflect the latest science and will provide greater clarity for industry, regulators and consumers and are outcome-based, focusing on the change that has been made rather than the process used to make the change.

The FSANZ approval now moves to Australian and New Zealand food ministers, who have 60 days to consider FSANZ’s decision.

This change, supported by GTA brings Australia in line with evolving regulations in some other jurisdictions where, if no foreign DNA (genes or genetic material) is present in a GE variety, that variety will not be subject to the same level of regulatory oversight applied to a GMO plant. Typically, this means that a pre-market risk assessment is not required.

#### **4. Grain Industry Stewardship Framework for New Technologies**

The grain industry recognises that technology innovations have the potential to contribute to positive outcomes for governments, farmers, consumers and the environment. However, it also recognises the need for the grain value chain to come together to enable a dialogue that will support commercial products/tools/processes (and any required supporting frameworks) enter the value chain without disruption to trade.

The Australian grain industry through its [Grain Industry Stewardship Framework for New Technologies](#) has adopted a market choice approach in relation to SDN-1 crops similar to its framework for GM crops. The Framework is a voluntary document that provides guidance to the grain industry to assist technology providers to understand industry requirements in relation to commercial products entering the value chain, and to assist the value chain in understanding market requirements and how to manage seed and grain as it moves through the supply chain.

The Framework encompasses the elements that the industry sees as necessary for introduction of a GE or GMO crop in a manner that will be least disruptive to the supply chain including stewardship, domestic and international regulatory requirements, and processes for managing planting seed and grain along the supply chain where GM and non-GM products co-exist.

As technologies are brought to market, understanding stakeholder perceptions and demonstrating responsible commercial usage of the technology is important to establish benchmarks, **provide confidence and choice to the market**; and to ensure access to technologies that will help the grain industry maintain global competitiveness, and prosper in a world of rapidly changing consumer preferences.

The Australian grain industry has long demonstrated its ability to manage a range of quality issues including GM and non-GM through the supply chain to meet market requirements. The industry processes will be responsive to managing GE issues.

For example, GTA members are involved in growing, handling and marketing GMO crops approved for commercial release. The industry has supported a position of market choice and has in place processes and tools across the grain industry supply chain to ensure that choice is enabled for producers, grain handlers and marketers and consumers. The grain industry has a demonstrated track record in delivering market choice with GM canola and can perform the same task for SDN-1 crops.

Australian grain is recognised globally for its safety and quality. This is based on the industry's sustainable production processes, its self-regulatory framework, that features grain produced with innovative technology in a clean and safe environment with high product quality and safety, supported by quality assurance systems across its supply chain.

## 5. Conclusion

The Tasmanian Government's *Genetically Modified Organisms (GMO) Environmental Scan* is a valuable document that will assist the Tasmanian Government and its constituents to understand, debate and confirm direction regarding SDN-1 organisms.

GTA supports the alignment of Tasmania in relation to SDN-1 crops to the 2019 Australian Government decision not to regulate SDN-1 technologies as GMs.

Please do not hesitate to contact GTA at any stage if you wish more information or discussion on any point in this submission.

Yours faithfully,



**Pat O'Shannassy**  
**CEO**

Attachments:

1. *Grain Industry Stewardship Framework for New Technologies*
2. *List of GTA Members*

## About GTA

[Grain Trade Australia](#) (GTA) is a national association and is the focal point for the commercial grain 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 the supply chain managers, marketers, consumers and exporters of Australia's grain.** GTA Members are responsible for over 95% of all grain storage and freight movements made each year in Australia. Over 95% of the grain contracts executed in Australia each year refer to GTA Grain Trading Standards and/or Trade Rules. GTA provides a formal Dispute Resolution Service accessible to grain industry participants.

GTA has established the [Australian Grains Industry Code of Practice](#). This Code outlines the quality assurance process and procedures across the grain supply chain, with supplementary Technical Guideline Documents (TGDs) providing additional details. **All GTA members are required to adhere to the Code of Practice.**

GTA Members are drawn from all sectors of the grain value chain from production to domestic end users and exporters. GTA has over 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.

*Ends:*



# GRAIN INDUSTRY **STEWARDSHIP FRAMEWORK** FOR NEW TECHNOLOGIES


An industry stewardship approach to new technologies  
Utilising the *Market Choice Framework*

An industry framework developed on behalf of the Australian Grain Industry  
by the Grain Trade Australia Plant Breeding Innovation Committee, the Information  
Technology Advisory Committee and the Trade and Market Access Committee.

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# Grain Trade Australia (GTA) brings together participants from across the grain value chain to work to facilitate trade

## 1.0 Introduction

There is broad recognition within the Australian grain industry that new technologies have the potential to play a major role in helping the industry meet the demands of food, feed and industrial consumers and that the industry requires competitive access to this technology in which it has made a significant investment.

The grain industry is and is expected to see broad application of technologies. Those of current focus for the industry include:

1. Plant breeding innovation
2. Data and Information Technology (IT)
3. Grain Assessment Technology (grain quality & biosecurity)

The industry recognises that technology innovations have the potential to contribute to positive outcomes for governments, farmers, consumers and the environment. However, it also recognises the need for the grain value chain to come together to enable a dialogue that will support commercial products/tools/processes (and any required supporting frameworks) enter the value chain without disruption to trade.

Against this backdrop, the ability for the grain value chain to identify and address emerging regulatory compliance and market access issues, customer requirements and sensitivity around information and data is important as new technologies seek to be commercialised. Similarly, it is important for some forms of technology to be supported through frameworks that provide guidance and a certification process. This is particularly critical for technology that can be used to assess and quantify grain quality for segregation and sale.

Accordingly, GTA is aiming to work with all parties across the grain value chain to develop a collaborative approach for the purpose of:

1. Promoting information sharing on technologies being developed for commercial application in the grain industry to avoid/minimise any trade disruption; and
2. Establishing criteria, certification and supporting frameworks for technology utilised in the grain supply chain.

### Market choice framework

The Australian grain industry has established a *Market Choice Framework* (MCF) to assist the industry facilitate trade in relation to Genetically Modified (GM) crops. This MCF was developed and through consultation is supported by the grain value chain. The principles of this Framework are that it is:

- voluntary,
- non-prescriptive

It aims to provide guidance to the industry to assist:

- technology providers to understand industry requirements in relation to commercial products entering the value chain;
- the value chain in understanding market requirements; and
- how to manage grain as it moves through the supply chain.

The MCF encompasses the elements that the industry sees as necessary for introduction of a GM crop in a manner that will be least disruptive to the supply chain including:

- domestic and international regulatory requirements;
- supply chain processes to deliver market choice; and
- stewardship.



The capacity to deliver market choice is built on the comprehensive and world-class protocols and processes that already operate in the Australian grain industry to enable grain and grain products to meet regulatory and customer specifications. These protocols and processes provide the necessary product integrity that engenders confidence to consumers and governments.

GTA has utilised the existing *Market Choice Framework* as a basis for a broader stewardship framework that covers a range of innovations and new technologies.

An industry driven technology stewardship framework will assist to ensure appropriate and responsible use of technologies and assist to support consumer acceptance. New governance models may need to be discussed and developed to ensure access to future technologies.

The Market Choice Framework and associated technical guidance documents enable the innovation sector to:

- engage with the grain value chain stakeholders to develop practical solutions to information- sharing about products seeking to be commercialised
- establish governance frameworks; and
- develop technology certification for trade

These approaches can help inform the development of an information sharing approach for other innovative products and technologies.

## Innovation supports the Australian grain industry to meet consumer demand

New and improved technologies are a key driver of future sustainability and profitability of Australian agriculture, and important in enabling the grain industry to continually improve economic performance/ productivity; and meet the demands of food, feed and industrial consumers.

In addition to commercial drivers, there are several macro factors behind the growing momentum for adoption of technology and innovation such as:

- food security,
- data security,
- sustainability,
- biosecurity,
- traceability, and
- climate change.

Emerging technologies can help growers and the industry meet and/or benefit from the rapidly changing desires and needs of consumers, as well as adapt to macro trends impacting natural resources and supply chains.

Today's consumers are placing increasing demands on the global food and fibre system. Consumers want to know where and how their food is grown, processed, packaged, and transported. There is a growing desire from consumers for transparency around issues such as food safety, health and wellness, and product discovery.

Consumer attitudes are also influencing the regulatory environment. Thus, understanding and, where possible, proactively identifying and mitigating risks is critical to ongoing access to innovative and new technologies.

Digital technologies including Artificial intelligence (AI) have the potential to fundamentally transform the way food is produced, traded and consumed. However, there are a range of constraints to realising the full economic potential of digital applications including:

- availability of appropriate data for analysis, underpinned by suitable data governance arrangements including systems and protocols governing digital information that provide clarity on data ownership, control and access issues and facilitates data sharing between multiple participants;
- availability of decision support tools and analysis capability to make use of the data acquired;
- a lack of a clearly-defined value proposition to potential technology users.



Adoption of digital solutions could assist the grain industry:

- improve efficiency /effectiveness e.g. visual recognition technology, blockchain, etc
- meet market requirements around compliance reporting or demonstration of verifiable outcomes/claims (e.g. sustainability, low carbon intensity, etc.)
- optimise investments through collecting and enabling access to aggregated, industry-level data.

The grain industry will continue to embrace new technologies, and it is important the industry demonstrates the responsible use of technology in order to capture and maintain community's trust and enables ongoing access to innovative technologies.

The industry needs to constructively engage with consumers to identify possible concerns and overcome barriers to adoption and establish governance, certification and supporting frameworks. As technologies are brought to market, understanding stakeholder perceptions and demonstrating responsible commercial usage of the technology is important to establish benchmarks, mitigate negative public perceptions; and to ensure access to technologies that will help the grain industry maintain global competitiveness, and prosper in a world of rapidly changing consumer preferences.

The proponents of technology also have incentive to ensure appropriate stewardship and responsible use due to the often-high cost of generating innovative technologies.

## 2.0 Purpose and outcomes

### Access to innovation is becoming more challenging

The technology /innovation environment is becoming more challenging due to the:

- Growing complexity of non-tariff barriers impacting access to markets and innovation
- Inconsistent regulatory environments e.g., for plant breeding innovation lack of timely and predictable approvals and lack of global regulatory alignment
- Lack of science and/or risk-based policies/regulatory approaches
- Uncertainty around consumer understanding and acceptance of risks of new technologies if science not well communicated
- Lack of clarity around the value proposition for all stakeholders across the value chain

A framework that facilitates engagement with stakeholders will assist to effectively communicate the positive attributes of technologies, manage negative perceptions that may arise and establish governance and certification requirements. This engagement needs to consider scientific, ethical, economic, social and environmental considerations.

### An industry approach to stewardship will help to build confidence in adoption of new technologies

Stewardship can be described as the responsible management of a product/ technology through its life cycle. The proposed Grain Technology Stewardship Framework is a shared approach that attempts to build engagement across the value chain throughout the life cycle. It is nonprescriptive and flexible to cover a broad range of technologies/ innovations, markets and impacts (economic, environmental and social).

The proposed Grain Technology Stewardship Framework is not a prescriptive set of processes, but rather a set of higher-level principles that individual company/sector stewardship activities may align to. It is a communication tool that:

- demonstrates the industry's commitment to stewardship,
- builds trust and confidence with consumers and the community,
- enables ongoing access to innovation.

The Grain Technology Stewardship Framework is dynamic and will evolve over time building on the experience of the industry and adoption of continuous improvement practices which will inform the Framework and its application, thus enabling it to evolve in an evidence-based manner.

The industry is seeking to establish a Grain Technology Stewardship Framework to support the introduction and effective utilisation of technology such as:

- plant breeding
- digital & information technology
- and grain assessment technology.

The industry has established a *Market Choice Framework* to manage GM technology and the Grain Technology Stewardship Framework builds on the principles of this *Market Choice Framework*.

The purpose of the stewardship approach is to ensure facilitation of trade with adoption of various innovations/ technologies.

The principles of the *Market Choice Framework* have been adapted for promoting stewardship across a range of new technologies. It requires a collaborative approach across the value chain.



The *Grain Technology Stewardship Framework* is a collaborative approach to facilitate adoption of technology/innovation in a manner that:

- Fosters access to innovative products/ tools/processes by growers, the grain supply chain and consumers
- Minimises or avoids trade disruptions
- Enhances/supports regulatory compliance
- Supports market choice and customer/ market access i.e. provides flexibility to meet differing stakeholder needs and regulatory scenarios globally
- Provides sustainable access to technology for farmers and the supply chain
- Enhances consumer confidence
- Facilitates sharing of best practices
- Provides a platform for future consultation as new technologies evolve and are adopted

The *Grain Technology Stewardship Framework* will also assist the industry mitigate risks related to operational risks i.e. direct and indirect impacts on ecosystem, which can lead to lower productivity and higher production costs, and market/regulatory risks i.e. maintaining market access and reputation.



# 3.0 Aim

The aim of developing and implementing a *Grain Technology Stewardship Framework* is to assist the industry to ensure access to and successful commercialisation of innovations. Specific objectives of implementing the Framework are to:

- Build trust and enhance transparency with the value chain and other stakeholders
- Support market acceptance and the availability of the product benefits to growers and consumers
- Facilitate an effective and efficient risk-based approach to managing supply chain and trade risks while meeting customer requirements
- Establish a process for information-sharing in relation to innovation applications
- Engage with the Government, as appropriate, to encourage practical and internationally aligned approaches
- Promote cooperation and information-sharing efforts that facilitate trade and mitigate disruptions
- Build effective dialogue and relationships to ensure early engagement around new products coming to market and build trust around the industry’s capacity and innovation stewardship
- Provide transparency and predictability for supply chain participants, most notably importers and exporters.

The *Grain Technology Stewardship Framework* will support these objectives through:

- Proactively highlighting development and management best practices to government officials, the value chain and stakeholder
- Promoting quality management systems for maintaining the integrity of new products/processes developed through innovation
- Acting as a guide and resource to technology developers that are new to the sector
- Supports the flow of trade by providing information to the value chain so that others can make informed decisions on what they view as appropriate based on their business model.



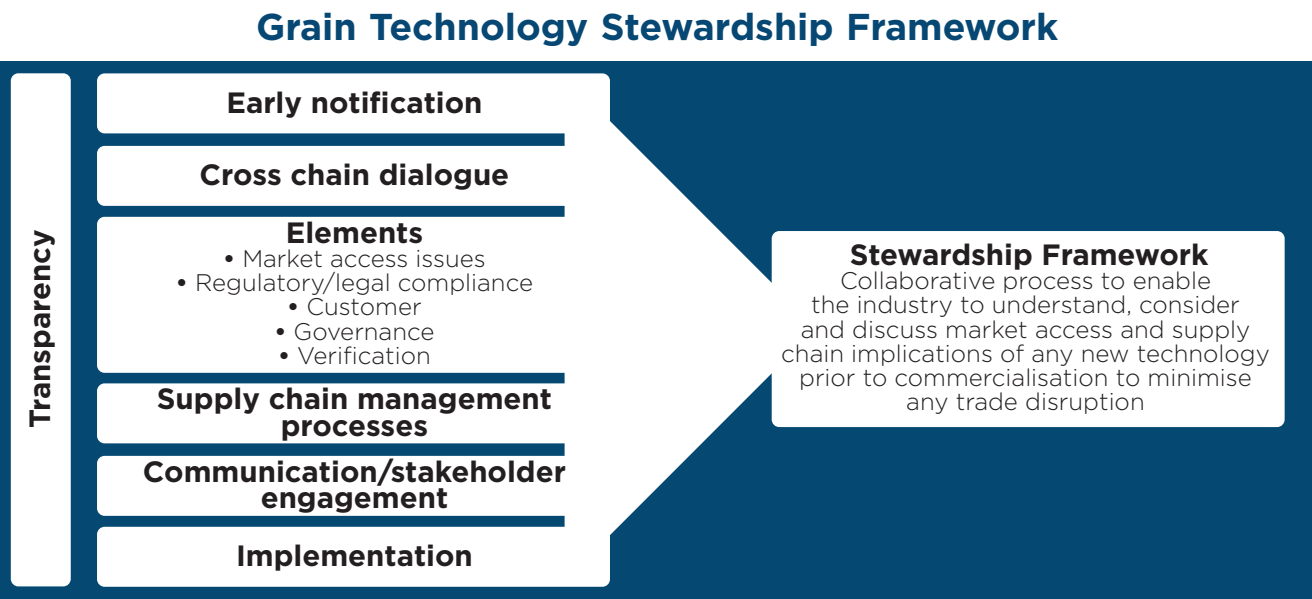
# 4.0 Framework

The *Grain Technology Stewardship Framework* is not a prescriptive set of processes, but rather a set of higher level principles that individual company/sector stewardship activities align to. These principles are:

1. Flexible framework that works with a range of innovations/technologies and for industry participants across varying size, scope and location of operations
2. The Framework supports collaborative leadership that is engaged in industry-wide dialogue, grounded in science, and open to the full range of technology choices

3. The Framework will evolve over time i.e. as the Framework is applied to different innovations and by different parts of the supply chain, adoption of continuous improvement principles will ensure that the Framework will evolve and improve in an evidence-based manner over time
4. Guidance and best practices for supply chain activities will focus around three key areas including information sharing (stakeholder engagement), market access and trade considerations, and quality management

The Grain Technology Stewardship Framework is shown in the figure below.



# Grain Technology Stewardship Framework

FRAMEWORK ELEMENT	REQUIREMENT
Early notification	It is preferable that the information- sharing dialogue occur as early as possible during the development of relevant technology, and in advance of commercial release. The timing and requirements will vary from technology to technology, but the intent is to provide sufficient time for market access issues to be identified, stakeholder engagement to occur, and supply chains to ensure they have processes in place to management the innovation.
Supply chain dialogue	The early notification will enable the supply chain time to review the implications from commercialisation of the technology and develop approaches to: <ul style="list-style-type: none"> <li>• Managing and/or mitigating risks</li> <li>• Supply chain operations</li> <li>• Building trust with consumers</li> <li>• Regulatory compliance</li> </ul>
Market access	Assessment of alignment with market requirements including: <ul style="list-style-type: none"> <li>• Australian regulatory approvals required are in place</li> <li>• Approvals in key exporting/importing markets are in place</li> <li>• Any potential market access or customer access disruptions that may need to be managed are identified</li> </ul>
Regulation compliance	Similar to above this element is focused on ensuring that all necessary approvals are in place including across legal requirements, Government regulations, industry regulations and guidelines. Consideration of the use of these guidelines may include where: <ul style="list-style-type: none"> <li>• Regulatory compliance requirements exist within Australia's domestic market that require market approvals</li> <li>• Regulatory compliance requirements exist in importing countries that require market approvals</li> <li>• Market/customer specifications exist which require pre-notification before import</li> <li>• And other specifications and/or requirements as may be agreed from time to time</li> <li>• Industry governance arrangements required to ensure interoperability between tools and systems, standardisation of data formats and frameworks, etc</li> </ul>
Governance	Governance Depending on the nature of the innovation/technology, there may be requirements for activities such as: <ul style="list-style-type: none"> <li>• Trading Standards development</li> <li>• Technical guidelines</li> <li>• Industry or policy processes e.g. data sharing rules, governance group, etc</li> <li>• Certification</li> </ul>

FRAMEWORK ELEMENT	REQUIREMENT
Supply chain management processes	The industry has a range of stewardship programs and codes of practice or conduct in place. These enable sharing of relevant information and consultation for the seamless movement of product into and along the supply chain and, where and when appropriate, the management of non-compliance. Commercial contractual arrangements underpin supply chain operations and management.  Industry participants to document stewardship programs and quality management systems currently in place. Based on this assessment: <ul style="list-style-type: none"> <li>• Supply chain participants develop and implement standards and processes to manage any market/customer risks e.g. closed loop/identity preserved</li> <li>• Technology developers should, where required to support supply chain processes, have support tools available at the earliest opportunity or at the time of commercial release e.g. detection method</li> <li>• Supply chain participants may develop and implement strategies to manage and integrate technologies e.g. data governance arrangements etc</li> </ul> The Framework should evaluate the robustness of the stewardship plans and whether sufficient industry supply chain management processes are in place to manage any market access disruptions that may arise.
Communication/ stakeholder engagement	The industry recognises the need for ongoing awareness and dialogue around the use of new technologies, regulatory compliance and market access implications.  Stakeholder engagement and a communications strategy will be important to ensure that new technologies are understood as this will facilitate adoption.  This component of the Framework will provide guidance for proactive engagement of the value chain and stakeholders. Key aspects for consultation to both obtain feedback and inform stakeholders will include: <ul style="list-style-type: none"> <li>• market assessment and trade analysis</li> <li>• systems in place to comply with any marketing restrictions, domestically or in importing countries</li> <li>• need for any changes to standards, processes, protocols etc,</li> <li>• actions taken regarding any regulatory considerations for the product</li> </ul>
Implementation mechanisms	Stewardship programs and quality management systems that align with the Grain Technology Stewardship Framework purpose and outcomes.



## 5.0 Implementation

The *Grain Technology Stewardship Framework* is about ensuring the industry's ability to deliver market choice. Globally, agricultural commodities are being increasingly differentiated in response to a range of drivers such as product safety, consumer preference, product traits, process traits and government regulation. Further, there are an increasing range of new tools and technologies to support industry efficiency of supply chains and practices, and to help meet customer requirements.

The Australian grain industry's supply chains are flexible and have the required capacity and capability for existing or new processes to incorporate and manage a broad range of new technologies and innovations.

It is important that stewardship programs supporting new technologies:

- are flexible and fit for purpose, cost effective, and incorporates industry best practices;
- support innovation and are scalable to meet the complexity and size of the participating organisations; and
- assist in the long-term viability and sustainability of the technology/innovation and the products developed from it.

The Australian grain industry has relied on the adoption of innovation to secure its global competitiveness. The industry needs continued access to new technology to remain at the forefront.

Australia has a strong global reputation of delivering quality grain products that meet customer specifications and a solid track-record of ensuring that the requirements of both domestic and export customers are met.

The industry also recognises the potential for trade disruptions and/or supply chain risks to occur with new technologies that are not brought to market in a collaborative way, nor managed appropriately through their life cycle. Support for the Grain Technology Stewardship Framework will ensure the Australian grain industry minimises risks and maximises opportunities offered by new technologies and innovations.

GTA's Plant Breeding Innovation Committee (PBIC) will continue to engage with industry, Government and other relevant GTA Technical Committees to ensure the Grain Technology Stewardship Framework remains fit for purpose.



# Schedule 1: Application of framework to gene-edited crops

ELEMENT	PROCESS	TRIGGER/ACTIVITY
Early notification	Notification is expected to be primarily through direct communication between the technology proponent and GTA. However, this could also be through media, market/customer query or industry discussions.  Technology/breeding companies are encouraged to advise GTA as early in process as possible but sufficiently ahead of commercialisation to identify and address market access issues and provide confidence to the supply chain.	Technology/breeding company direct contact to GTA Annual meeting Market/customer query Media  GTA to actively promote the opportunity for technology developers to engage with GTA under a confidentiality agreement as part of aligning supply chain operations with the deployment of the technology.
	GTA will also meet with relevant industry organisations such as GRDC, Australian Crop Breeders (ACB), Australian Seeds Federation (ASF) and Croplife in relation to information exchange around technology developments and review of the process to ensure it remains relevant and is continually improved as appropriate.	Confidentiality agreement in place  Information to be shared agreed.
Supply chain review	GTA nominated technical expert/s will liaise with the proponent of the proposed variety/trait for commercial release and will then undertake an assessment to identify: <ul style="list-style-type: none"> <li>Markets of interest</li> <li>Regulatory compliance i.e. Australian approvals, key exporting/importing markets approvals</li> <li>Market/customer specifications exist which require pre-notification before import</li> <li>Any potential market access or customer access disruptions that may need to be managed are identified</li> <li>Supply chain implications and industry governance arrangements applicable e.g. standards, supply chain management processes, industry or policy processes</li> </ul>	Proponent provides agreed information to GTA nominated technical expert/s (TE)  TE will review any material supplied and undertake consultation with the supply chain, customers and other parties as appropriate.  TE provide direction on any potential market access impacts ie: <ul style="list-style-type: none"> <li>If there is likely to be any potential market access or customer access disruptions that may need to be managed</li> <li>whether all relevant market access approvals are in place for importing countries of interest to Australia</li> <li>robustness of the stewardship plans</li> <li>industry supply chain management processes that may be required to manage any market access disruptions that may arise</li> </ul>
	Based on information provided, the TE will either advise that: <ol style="list-style-type: none"> <li>conditions are in place, and thus no significant market access impacts are identified.</li> <li>Market access issues may occur and/or changes to industry processes may be required i.e. if industry is not expected to be able to manage any market access issues arising (for example relevant market approvals are not in place)</li> </ol> Subject to the outcome of TE's review and subsequent processes, a communication of relevant information and outcomes to the broader grain industry will be agreed and implemented.	If 1, GTA advises the proponent and the grain trade and no further discussion is warranted other than general industry updates and reporting as per existing industry practice  If 2., the proponent will be advised and the TE will then in good faith, discuss the possible approaches to address any potential concerns with the proponent. A consultative process between the TE (GTA) and the proponent will be initiated to allow for further discussion and clarification of the disruptions and the preventative actions for implementation (if required).  The outcome of the consultation will be an agreement on the proposed actions to be implemented (if required) and the scope and roll out of the information provided to grains industry stakeholders.



# Schedule 1: Application of framework to gene-edited crops (cont)

ELEMENT	PROCESS	TRIGGER/ACTIVITY
Supply chain management processes	<p>Based on the information provided from the previous step, GTA will work with the supply chain to ensure that the existing processes, codes of practice and other tools in place are adequate and/or review and modify as required. This could include activities such as:</p> <ul style="list-style-type: none"> <li>Supply chain participants develop and implement standards and processes to manage any market/customer risks e.g. closed loop/identity preserved if required</li> <li>Technology developers should make available prior to commercialisation any support tools required</li> <li>Supply chain participants develop and implement strategies to manage and integrate technologies e.g. data governance arrangements etc</li> </ul>	GTA review/manage through existing technical committees
Communication/stakeholder engagement	<p>In parallel to the steps above, GTA will develop a Stakeholder Engagement and Communications Strategy to ensure that the industry remains informed of developments as appropriate. Importantly this will also address communication with key markets and/or customers.</p> <p>This will include:</p> <ul style="list-style-type: none"> <li>market assessment and trade analysis</li> <li>systems in place to comply with any marketing restrictions, domestically or in importing countries</li> <li>need for any changes to standards, processes, protocols etc,</li> <li>actions taken regarding any regulatory considerations for the product</li> </ul>	GTA develop Strategy through PBIC and GTA's Trade & Market Access Committee and then implement strategy

This Grain Industry Stewardship Framework for New Technologies must stay relevant to support the grain industry requirements. GTA will ensure there will be a regular annual review of the Grain Technology Stewardship Framework. This will include the PBIC, the Technology Experts, the grain industry and other stakeholders to ensure the process remains fit for purpose.

## Glossary

AI	Artificial intelligence	MCF	Market Choice Framework
ACB	Australian Crop Breeders	NBT	New breeding technologies
ASF	Australian Seeds Federation	NGT	New genomic technologies
GM	Genetically modified	PBI	Plant Breeding Innovation (used interchangeably with NBTs, NGTs)
GRDC	Grains Research & Development Corporation	PBIC	Plant Breeding Innovation Committee
GTA	Grain Trade Australia	TE	Technical experts
IT	Information technology		



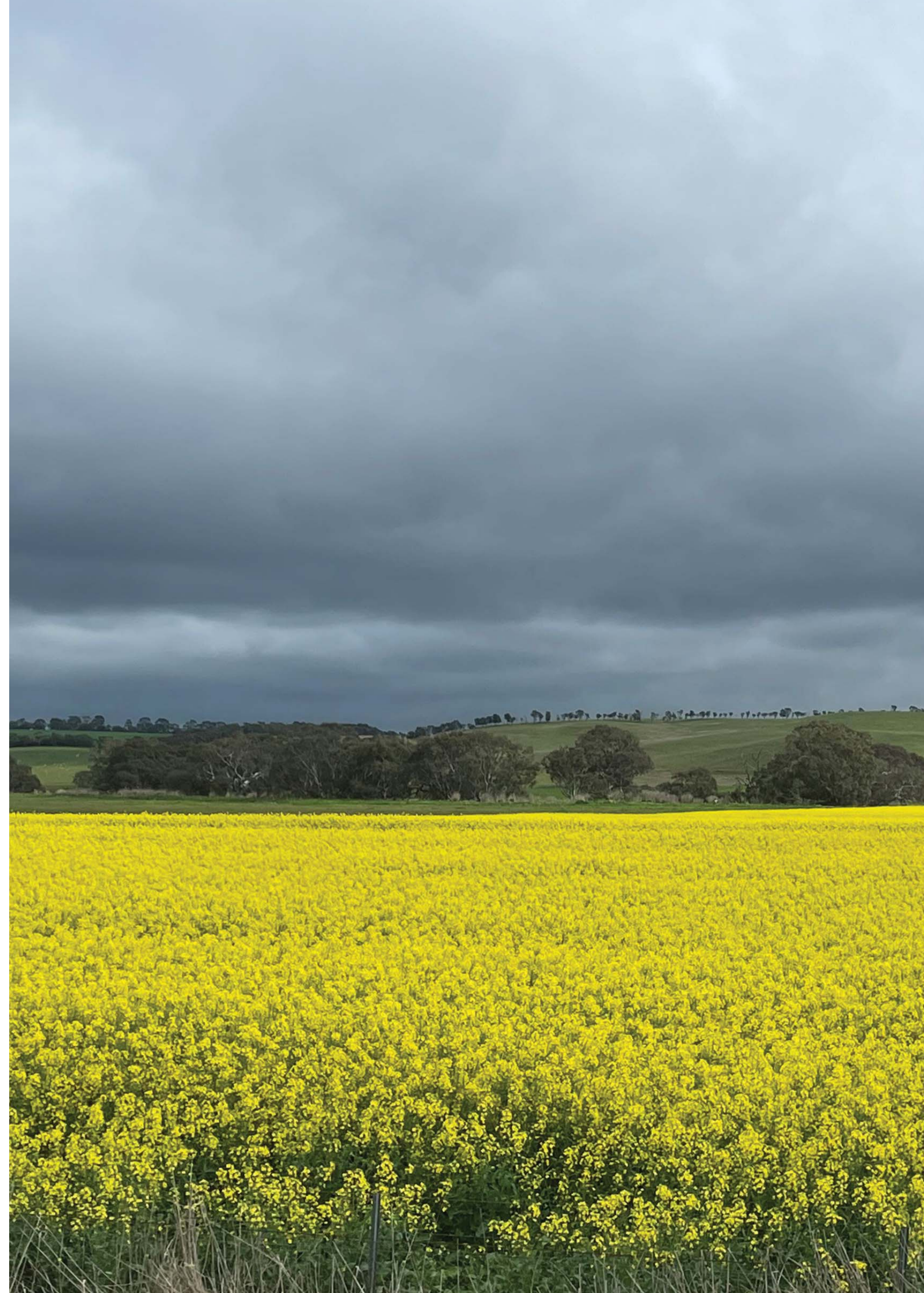
# Attachment 1: Potential information sharing elements

The following information would assist in the evaluation of market access implications. An agreed list of information to be shared will be developed between GTA and proponent, noting that there may be confidentiality issues that restrict some information being provided in certain cases:

- The contact details of the Plant Breeding Company
- The modern breeding technology applied and the trait of interest being developed.
- The crop species in which the trait of interest being developed.
- The market segment into which the product will be targeted (e.g. noodle wheat)
- The variety/ies in which the trait of interest will be released and the regions within Australia where the varieties will be released for grain production - within and between years.
- Availability and access to trait detection technology (e.g. PCR assay) that can be utilised by value chain stakeholders/participants to assist in the monitoring the presence/absence of the trait of interest as required
- The expected timeframe for commercial release, and for obtaining pre-market regulatory approvals (if required) in importing countries for commodities produced from the grain containing the trait of interest

- The expected market i.e., domestic/ export only, no restriction
- Regulatory compliance information relating to the plant breeding innovation technology and/or trait of interest in target export market(s) and/or measures being taken to gain compliance with required domestic or international governmental approvals or authorizations, if any, prior to commercialization
- Proposed stewardship plans/process-management systems e.g. stewardship, closed-loop or identity-preservation, including product recall strategies, If required to meet regulatory or market requirements

It is recognised that in some circumstances some regulatory data and intellectually property related information covered by Commercial In Confidence agreements may not be available at the time of initial sharing information. Where there are 'gaps' in information the Guidelines encourage early communication recognising that information 'gaps' can be addressed as commercialisation progresses.







Grain Trade Australia Ltd

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[www.graintrade.org.au](http://www.graintrade.org.au)



Membership List as of 23 January 2025

Member Type	Member Level	Account Name	Primary Contact	Website
Ordinary Member	A1	CBH Group	Ben Macnamara	<a href="http://www.cbh.com.au">www.cbh.com.au</a>
		GrainCorp Australia	Robert Spurway	<a href="http://www.graincorp.com.au">www.graincorp.com.au</a>
		Viterra Australia	Philip Hughes	<a href="http://www.viterra.com.au">www.viterra.com.au</a>
			3	
	A3	Cargill Australia	Zsolt Kocza	<a href="http://www.cargill.com.au">www.cargill.com.au</a>
			1	
	A4	ADM Trading Australia	Darryl Borlase	<a href="http://www.adm.com">www.adm.com</a>
		Australian Grain Export Pty Ltd	Tim Martin	<a href="http://www.australiangrainexport.com.au">www.australiangrainexport.com.au</a>
		Bunge Agribusiness Australia	Stephen Bennett	<a href="http://www.bunge.com">www.bunge.com</a>
		Louis Dreyfus Company Emerald Australia	David Johnson	<a href="http://www ldc.com">www ldc.com</a>
			4	
	B1	Arrow Commodities	Dominic Vanzella	<a href="http://www.arrowcom.com.au">www.arrowcom.com.au</a>
		CHS Broadbent	Steve Broadbent	<a href="http://www.broadbentgrain.com.au">www.broadbentgrain.com.au</a>
		George Weston Foods	Michael Schmidt	<a href="http://www.gwf.com.au">www.gwf.com.au</a>
		Manildra Group	Peter Sloan	<a href="http://www.manildra.com.au">www.manildra.com.au</a>
		Riordan Grain Services	Jim Riordan	<a href="http://www.riordangrains.com.au">www.riordangrains.com.au</a>
			5	
	B2	Centre State Exports	Jeff Voigt	<a href="http://www.centrestateexports.com.au">www.centrestateexports.com.au</a>
		ETG Commodities	Peter McMeekin	<a href="http://www.etgworld.com">www.etgworld.com</a>
		Inghams Enterprise Pty Ltd	Matt Clarke	<a href="http://www.ingham.com.au">www.ingham.com.au</a>
		J K International Pty Ltd	Sandeep Mohan	<a href="http://www.jki.com.au">www.jki.com.au</a>
		Ridley Agriproducts	Reagan Stroud	<a href="http://www.agriproducts.com.au">www.agriproducts.com.au</a>
		Riverina (Australia)	Jon Mulally	<a href="http://www.riverina.com.au">www.riverina.com.au</a>
		Wilmar Trading (Australia) Pty Ltd	Matt Albion	<a href="http://www.wilmargavilon.com">www.wilmargavilon.com</a>
			7	
	B3	Allied Pinnacle	Brett Duczmal	<a href="http://www.alliedmills.com.au">www.alliedmills.com.au</a>
		Brahman Commodities	Michael Aikman	<a href="http://www.brahmancommodities.com.au">www.brahmancommodities.com.au</a>
		Cofco International Australia	Sarah Pan	<a href="http://www.cofcointernational.com">www.cofcointernational.com</a>
		Demeter Grains	Barry Mansfield	<a href="http://www.demetergrains.com.au">www.demetergrains.com.au</a>
		K M & W M Kelly & Sons	Matt Kelly	<a href="http://www.kellygrains.com.au">www.kellygrains.com.au</a>
		Quadra Commodities	Robin Cassar	<a href="http://www.quadra.com">www.quadra.com</a>
		Qube Logistics (SB) Pty Ltd (T/A Qube Agri)	Jeremy Brown	<a href="http://www.qube.com.au">www.qube.com.au</a>
		Robinson Grain Trading	Adam Robinson	<a href="http://www.robinsongrain.com.au">www.robinsongrain.com.au</a>
			8	
	C1	Agracom	Joe Hallman	<a href="http://www.agracom.com.au">www.agracom.com.au</a>
		Agrisk (Market Check)	Brett Stevenson	<a href="http://www.marketcheck.com.au">www.marketcheck.com.au</a>
		AGT Foods Australia	Michael Brittain	<a href="http://www.agtfoods.com/australia">www.agtfoods.com/australia</a>
		Associated Grain t/a Agrocorp Processing Australia	Russell Darbey	<a href="http://www.agrocorp.com.au">www.agrocorp.com.au</a>
		Australian Food & Fibre Processing	Peter Webb	<a href="http://www.australianfoodandfibre.com.au">www.australianfoodandfibre.com.au</a>
		Australian Fresh Milk Holdings (AFMH)	Jill Smith	<a href="http://www.afmh.com.au">www.afmh.com.au</a>
		BFB Pty Ltd	Shane Bird	<a href="http://www.bfb.com.au">www.bfb.com.au</a>
		Blairs Produce Company	Sean Blair	<a href="http://crt.com.au/store/blairs-produce-company/">crt.com.au/store/blairs-produce-company/</a>
		Boolah Farms Pty Ltd	Stuart Tighe	<a href="http://www.boolah.com.au">www.boolah.com.au</a>
		Castlegate James Australasia Pty Ltd	Kevin O'Brien	<a href="http://www.castlegatejames.com.au">www.castlegatejames.com.au</a>
		COPRICE	Hugo Steinfert	<a href="http://www.coprice.com.au">www.coprice.com.au</a>
		Darwalla Milling Co Pty Ltd	Gary Heidenreich	<a href="http://www.darwalla.com.au">www.darwalla.com.au</a>
		DDT Holdings	Rajeev Saraff	<a href="http://www.ddtholdings.com.au">www.ddtholdings.com.au</a>
		Deckert Group Pty Ltd	Chris Deckert	<a href="http://www.deckerts.com.au">www.deckerts.com.au</a>
		Esperance Quality Grains Pty Ltd	Neil Wandel	<a href="http://www.esperancequalitygrains.com">www.esperancequalitygrains.com</a>
		Fletcher International Exports	Joe Masters	<a href="http://www.fletchint.com.au">www.fletchint.com.au</a>
		Fodder Link Pty Ltd	Cameron Angel	<a href="http://www.fodderlink.com.au">www.fodderlink.com.au</a>
		Hanlon Enterprises	Chris Coates	<a href="http://www.hanlonenterprises.com.au">www.hanlonenterprises.com.au</a>
		Hazeldenes Chicken Farm	Marcus Dingle	<a href="http://www.hazeldenes.com.au">www.hazeldenes.com.au</a>
		IGH Commodities	Brad Bryant	<a href="http://www.igh.net.au">www.igh.net.au</a>
		Inari Australia	Karan Singh	<a href="http://www.inariaustralia.com.au">www.inariaustralia.com.au</a>
		Irwin Stockfeeds	Bryan Irwin	<a href="http://www.irwinstockfeeds.com.au">www.irwinstockfeeds.com.au</a>
		Itochu Australia Ltd	Ayush Rajvanshi	<a href="http://www.itochu.com.au">www.itochu.com.au</a>
		Jerilderie Grain Storage & Handling	David Barlow	<a href="http://www.jgsh.com.au">www.jgsh.com.au</a>
		Laucke Flour Mills Pty Ltd	Roger Laubsch	<a href="http://www.laucke.com.au">www.laucke.com.au</a>
		Lawson Grains	John Marshall	<a href="http://www.lawsongrains.com">www.lawsongrains.com</a>
		LPC Trading Pty Ltd	Simon Langfield	<a href="http://www.lpc trading.com.au">www.lpc trading.com.au</a>
		Malteurop Australia Pty Ltd	Eric Fisher	<a href="http://www.malteurop.com/en/australia">www.malteurop.com/en/australia</a>
		MC Croker	Jason McPherson	<a href="http://www.crokergrain.com.au">www.crokergrain.com.au</a>
		MSM Milling Pty Ltd	Peter MacSmith	<a href="http://www.msmmilling.com.au">www.msmmilling.com.au</a>
		Namoi Cotton Ltd	Nathan Hunter	<a href="http://www.namoicotton.com.au">www.namoicotton.com.au</a>
		Pentarch Agricultural Pty Ltd	James Whiteside	<a href="http://www.pentarch.com.au">www.pentarch.com.au</a>
		Premium Grain Handlers P/L	John Orr	<a href="http://www.pgh.com.au">www.pgh.com.au</a>
		Queensland Cotton Corporation	Ashish Govil	<a href="http://www.qcotton.com.au">www.qcotton.com.au</a>
		Reid Stockfeeds Pty Ltd	Ian Reid	<a href="http://www.reidstockfeeds.com.au">www.reidstockfeeds.com.au</a>
		Rex James Stockfeed	Natasha Davies	<a href="http://www.jamesstockfeed.com.au">www.jamesstockfeed.com.au</a>
		Rivalea (Australia) Pty Ltd - Animal Nutrition	Andrew Philpotts	<a href="http://www.rivalea.com.au">www.rivalea.com.au</a>
		Riverina Oils & Bioenergy	Krissy Campbell	<a href="http://www.riverinaoils.com">www.riverinaoils.com</a>
		SunPork Farms Feed Mills	Mark Young	<a href="http://www.sunporkgroup.com.au">www.sunporkgroup.com.au</a>
		ThriveAgri Pty Ltd	Charlie Brown	<a href="http://www.thriveagri.com">www.thriveagri.com</a>
		TSS Grain (Tasmanian Stockfeed Services)	Trevor Macleod	<a href="http://www.tasstockfeed.com.au">www.tasstockfeed.com.au</a>
		Unigrain Pty Ltd	Ervin Leong	<a href="http://www.unigrain.com.au">www.unigrain.com.au</a>
		Viridis Ag	Chris Reeves	<a href="http://www.viridisag.com">www.viridisag.com</a>
		W B Hunter Pty Ltd	Stewart Coombes	<a href="http://www.wbhunter.com.au">www.wbhunter.com.au</a>
		Wilken Grain	Richard Wilken	<a href="http://www.wilkens.com.au">www.wilkens.com.au</a>
		Woods Grain Pty Ltd	Bruce Woods	<a href="http://www.woodsgrain.com.au">www.woodsgrain.com.au</a>
		XLD Commodities	John Tuskin	<a href="http://www.xldgrain.com.au">www.xldgrain.com.au</a>
			47	
	C2	Access Grain Pty Ltd	Wade Humphries	<a href="http://www.accessgrain.com.au">www.accessgrain.com.au</a>



Adams Australia Pty Ltd	Ian Mack	<a href="http://www.adamsaustralia.com.au">www.adamsaustralia.com.au</a>
Aditi UVG	Harshad Kale	<a href="http://www.aditiuvg.com">www.aditiuvg.com</a>
Aditya Birla Global Trading ( Australia)	Surya Jain	<a href="http://www.abgtrading.com">www.abgtrading.com</a>
Advantage Grain Pty Ltd	Chris Nikolaou	<a href="http://www.advantagegrain.com.au">www.advantagegrain.com.au</a>
Ag Connex Pty Ltd	Geoff Barker	<a href="http://www.agconnex.com.au">www.agconnex.com.au</a>
Agmark Commodities	Richard Alcorn	<a href="http://www.agmark.com.au">www.agmark.com.au</a>
Agri Om Australia Pty Ltd	Kishore Bulchandani	<a href="http://www.agriom.com.au">www.agriom.com.au</a>
Agri-Oz Exports (Aust) Pty Ltd	Francois Darcas	<a href="https://www.linkedin.com/in/francois-darcas-4a440577">linkedin.com/in/francois-darcas-4a440577</a>
Agromin Australia Pty Ltd	Rajni Patel	<a href="http://www.agromin.com.au">www.agromin.com.au</a>
Alliance Grains	Luke Walker	<a href="http://www.alliancegrains.com.au">www.alliancegrains.com.au</a>
Arya Pulses Australia Pty Ltd	Aravindhan Ravindraraj	<a href="http://www.aryapulses.com.au">www.aryapulses.com.au</a>
A T Waterfield & Son Pty Ltd	Brad Waterfield	<a href="https://www.linkedin.com/in/brad-waterfield-8767869b">linkedin.com/in/brad-waterfield-8767869b</a>
Australian - Asian Agricultural Exports (AAAX)	Mick Connolly	<a href="http://www.aaax.ws">www.aaax.ws</a>
Australian Choice Exports Pty Ltd	James Hunt	<a href="http://www.australianchoiceexports.com.au">www.australianchoiceexports.com.au</a>
Australian Grain Storage	Matt Bailey	<a href="http://www.sunrice.com.au">www.sunrice.com.au</a>
Australian Growers Direct Pty Ltd	Tyrone Stowers	<a href="http://www.ausgrowersdirect.com.au">www.ausgrowersdirect.com.au</a>
Australian Mungbean Company Pty Ltd	Damien White	<a href="http://www.australianmungbean.com.au">www.australianmungbean.com.au</a>
A W Vater & Co	Kim Vater	<a href="http://www.vater.com.au">www.vater.com.au</a>
Baker Grain	Richard Baker	<a href="http://www.bakergrain.com.au">www.bakergrain.com.au</a>
Boort Grain Co-Operative	Jon Bucknall	<a href="http://www.boortco-op.com.au">www.boortco-op.com.au</a>
Broun & Co Pty Ltd	Charles Coventry	<a href="http://www.brounandco.com.au">www.brounandco.com.au</a>
C & S Trading Pty Ltd	Craig Scholz	<a href="http://www.scholzsh.com.au">www.scholzsh.com.au</a>
Carpendale Agri Pty Ltd	Andrew Kluck	<a href="http://www.carpendale.com.au">www.carpendale.com.au</a>
Carson Stockfeed Pty Ltd	John Carson	03 6634 7376
Chester Commodities	Richard Black	<a href="http://www.chestercommodities.com.au">www.chestercommodities.com.au</a>
C K Tremlett Pty Ltd	Andrew Tremlett	<a href="https://www.linkedin.com/in/andrew-tremlett-36a06385">linkedin.com/in/andrew-tremlett-36a06385</a>
CL Commodities	Robert Lean	<a href="http://www.clcommodities.com.au">www.clcommodities.com.au</a>
Coorow Seeds	Brian Pover	<a href="http://www.coorowseeds.com.au">www.coorowseeds.com.au</a>
Cory Johnston (Aust) Pty Ltd	Alicia Dolan	<a href="http://www.coryjohnston.com.au">www.coryjohnston.com.au</a>
Defiance Maize Products Pty Ltd	Rodney Walker	<a href="http://www.corson.co.nz">www.corson.co.nz</a>
Direct Commodities	Hamish Robertson	<a href="http://www.directcommodities.com.au">www.directcommodities.com.au</a>
East Coast Stockfeeds	Stuart Dolden	<a href="http://www.ecsf.com.au">www.ecsf.com.au</a>
Ellerslie Free Range Farms Pty Ltd	Maria Sue-Tin	<a href="http://www.dahall.com.au">www.dahall.com.au</a>
ETG Processing Pty Ltd T/A Wimpak	Brock Tait	<a href="http://www.wimpak.com.au">www.wimpak.com.au</a>
Excel Farms	Nicholas Paterson	<a href="http://www.excellfarms.com.au">excellfarms.com.au</a>
Export Import Australia	Dhanesh Kumar	<a href="http://www.exportimportaustralia.com.au">www.exportimportaustralia.com.au</a>
Export Trading Group Australia Pty Ltd	Shayne Clark	<a href="http://www.etgworld.com">www.etgworld.com</a>
Fanmac Logistics Pty Ltd	Chris Fanning	<a href="http://www.fanmacag.com.au">www.fanmacag.com.au</a>
Feed Central Pty Ltd	Tim Ford	<a href="http://www.feedcentral.com.au">www.feedcentral.com.au</a>
Findlays Borellan	Neil Findlay	<a href="http://www.findlay.world/about-us">www.findlay.world/about-us</a>
Gold Star International Pty Ltd	Abhishek Kotkar	<a href="http://www.goldstarinternational.com.au">www.goldstarinternational.com.au</a>
GO Resources Pty Ltd	Murray Gannon	<a href="http://www.go-resources.com.au">www.go-resources.com.au</a>
Grainforce Pty Ltd	Stella Larnach	<a href="http://www.grainforce.com">www.grainforce.com</a>
Grain Link WA Pty Ltd	Andrew Goyder	<a href="http://www.grainlink.com.au">www.grainlink.com.au</a>
Grenfell Commodities Pty Ltd	Glenn Beasley	<a href="http://www.grenfellcomm.com.au">www.grenfellcomm.com.au</a>
GV Grain & Fodder	Joanne Harry	<a href="https://www.linkedin.com/in/joanne-harry-707119116">linkedin.com/in/joanne-harry-707119116</a>
Harwood Grains & Stockfeeds	Paul Harwood	<a href="http://www.harwoodgrains.com.au">www.harwoodgrains.com.au</a>
Horizon Commodities Pty Ltd	Aaron Jones	<a href="http://www.horizoncommodities.com.au">www.horizoncommodities.com.au</a>
HX Food Group (Aus) Pty Ltd	Dong Zhao	<a href="http://www.hxfoodgroup.com.au">www.hxfoodgroup.com.au</a>
Jatlee Australia	Sunil Kumar	<a href="http://www.jatleecorp.com">www.jatleecorp.com</a>
JH Grain Pty Ltd	Geoff Zhou	<a href="http://www.jhgrain.com.au">www.jhgrain.com.au</a>
J W Koek & Company	Brian Algate	07 3341 4548
Kangaroo Island Pure Grain	Emma Tonkin	<a href="http://www.kipuregrain.com">www.kipuregrain.com</a>
KB Agri Services Pty Ltd	Karl Bliss	<a href="https://www.linkedin.com/in/karl-bliss-916bb679">linkedin.com/in/karl-bliss-916bb679</a>
Kennett Rural Services Pty Ltd	Andrew Kennett	<a href="http://www.kennettrural.com.au">www.kennettrural.com.au</a>
Lachlan Commodities Pty Ltd	Tony Cogswell	<a href="http://www.lachlancommodities.com">www.lachlancommodities.com</a>
Lane Grain Pty Ltd	Garry Lane	<a href="https://www.linkedin.com/in/garry-lane-82635b88">linkedin.com/in/garry-lane-82635b88</a>
Mahonys Transport Services	Luke Mahony	<a href="https://www.mahonystransport.com.au">https://www.mahonystransport.com.au</a>
Mallon AgCommodities	Blake Mallon	<a href="http://mallonag.com.au">mallonag.com.au</a>
Mandala Trading	Jay Saraff	<a href="http://www.mandalatrading.com.au">www.mandalatrading.com.au</a>
Marina Commodities (Australia)	Palwinder Singh	<a href="http://www.marina.commodities.com">www.marina.commodities.com</a>
Matthews Transport and Grain Traders	Neville Matthews	<a href="https://www.linkedin.com/in/neville-matthews-aa592191">linkedin.com/in/neville-matthews-aa592191</a>
Max Grains Pty Ltd	Jack Fahy	<a href="http://www.maxgrains.com.au">www.maxgrains.com.au</a>
Mckenzie Ag Services	Lachlan Mckenzie	<a href="http://www.mckenzieag.com.au">www.mckenzieag.com.au</a>
McNaughts Grain & Fertilizer Pty Ltd	Daniel Mcnaught	<a href="http://www.mcnaughts.com">www.mcnaughts.com</a>
Melaluka Trading Pty Ltd	Simon Pritchard	<a href="http://www.melalukatradng.com.au">www.melalukatradng.com.au</a>
Melco Pty Ltd	Steve Mellington	<a href="http://www.melco.com.au">www.melco.com.au</a>
Nandaly Grain Co-Operative	Jon Bucknall	<a href="http://www.nandalyco-op.com.au">www.nandalyco-op.com.au</a>
Network Grains Pty Ltd	Craig Dennis	<a href="http://www.networkgrains.com.au">www.networkgrains.com.au</a>
Norco	Jaco Van der Merwe	<a href="https://www.norco.com.au/agrisolutions/grain-team.php">https://www.norco.com.au/agrisolutions/grain-team.php</a>
Northbound Trading Pty Ltd t/a WA Lupins	Daniel Marshall	<a href="http://www.walupins.com.au">www.walupins.com.au</a>
Origin Grain Pty Ltd	Marcus Currie	<a href="http://www.origingrain.com">www.origingrain.com</a>
Outlook Commodities	Dominic Hogan	<a href="https://facebook.com/Outlookcommodities">https://facebook.com/Outlookcommodities</a>
Pacific Global Sprouts Pty Ltd	Prashant Kewlani	<a href="http://www.pacificglobalsprouts.com">www.pacificglobalsprouts.com</a>
Parkinson Bros	Rohan Parkinson	<a href="https://www.linkedin.com/in/rohan-parkinson-a76a761b4">linkedin.com/in/rohan-parkinson-a76a761b4</a>
PB Seeds	Peter Blair	<a href="http://www.pbseeds.com.au">www.pbseeds.com.au</a>
Pearson's Grain	Darren Pearson	<a href="http://www.pearsonsgroup.com.au">www.pearsonsgroup.com.au</a>
Peters Commodities	Michael Oxley	<a href="http://www.petcom.com.au">www.petcom.com.au</a>
Pinnacle Grains Pty Ltd	Sonal Vij	<a href="http://www.pinnaclegrains.com.au">www.pinnaclegrains.com.au</a>
Plum Grove	Rikki Foss	<a href="http://www.plumgrove.com.au">www.plumgrove.com.au</a>
QS Commodities Pty Ltd	Nick Slipper	<a href="http://www.qscommodities.com">www.qscommodities.com</a>
RP Grain Pty Ltd	Gordon Pulham	<a href="http://randparriers.com.au/r-p-grains">randparriers.com.au/r-p-grains</a>
Rural Logic (Aust) Pty Ltd	Michael Wood	<a href="http://www.rurallogic.com.au">www.rurallogic.com.au</a>
Shannon Bros Bulk Storage Pty Ltd	Clayton Shannon	<a href="http://www.shannonbros.com.au">www.shannonbros.com.au</a>
Silo Bag Grain (NSW QLD) Pty Ltd	Lesley Kilby	<a href="http://www.silobaggrain.com.au">www.silobaggrain.com.au</a>
Societa Cofica	Dia Ram Sharma	<a href="http://www.societacofica.com.au">www.societacofica.com.au</a>
Southern Grain Pty Ltd	Tim Gross	<a href="http://www.southernstockfeeds.com.au">www.southernstockfeeds.com.au</a>
Southern Grain Storage Pty Ltd	Campbell Brumby	<a href="http://www.southerngrains.com.au">www.southerngrains.com.au</a>
Spagrimon Australia	Jiger Kotecha	<a href="http://www.spagrimon.com.au">www.spagrimon.com.au</a>
Standard Commodities Australia Pty Ltd	Elizabeth Bozinoska	<a href="http://www.stancom.com.au">www.stancom.com.au</a>

		Sudima Australia	James Garvey	<a href="http://www.sudima.com">www.sudima.com</a>
		Sun Euro Australia	Tarun Saxena	<a href="http://www.suneuro.com.au">www.suneuro.com.au</a>
		Tamma Grains Australia Pty Ltd	Kim Packer	<a href="http://www.tammagrains.com.au">www.tammagrains.com.au</a>
		Tiller Commodities Pty Ltd	Brett Cooper	<a href="http://www.tillercommodities.com">www.tillercommodities.com</a>
		TRC International	Yohan Goonetilleke	<a href="http://www.trcglobal.com.my">www.trcglobal.com.my</a>
		Trentham Grazing Pty Ltd (t/a Godde's Grain & Fertiliser Pty Ltd)	Barry Fisher	<a href="http://www.goddesgrainandfertiliser.com.au">www.goddesgrainandfertiliser.com.au</a>
		UluPna Pastoral Co Pty Ltd	Carly-Lee Perkins	<a href="http://www.ulupna.com.au">www.ulupna.com.au</a>
		Ulusoy Asia Pacific	Muhammet Genc	<a href="http://www.ulusoymflour.com">www.ulusoymflour.com</a>
		Universal Commodity Management	Tim Dean	<a href="http://www.commoditymanagement.com.au">www.commoditymanagement.com.au</a>
		Ward McKenzie	Greg Howe	<a href="http://www.mckenziefoods.com.au">www.mckenziefoods.com.au</a>
		Waterfall Australia	Ian Mallon	<a href="mailto:ian@waterfallaustralia.com.au">ian@waterfallaustralia.com.au</a>
		Watsons Bulk	Joel Watson	<a href="http://www.wbl.net.au">www.wbl.net.au</a>
		WHG Oceania Pty Ltd	Gesheng Shen	<a href="mailto:shen@tqaj.cn">shen@tqaj.cn</a>
		Wirrinourt Transport & Trading	Karl Hendy	<a href="http://www.wirrinourttransport.com.au">www.wirrinourttransport.com.au</a>
		WW Agri Pty Ltd	Steve Sloss	<a href="http://www.wwagri.com.au">wwagri.com.au</a>
		ZTC Australia	Timothy Byass	<a href="http://www.ztcaus.com">www.ztcaus.com</a>
			107	
Transport Operator		Crawfords Freightlines Pty Ltd	Phillip Davis	<a href="http://www.crawfordsfreightlines.com.au">www.crawfordsfreightlines.com.au</a>
		Gehrke Grains & Transport Pty Ltd	Julian Gehrke	<a href="http://www.gehrke.com.au">www.gehrke.com.au</a>
		Hamilton Contracting (NSW) Pty Ltd	Jodie Hamilton	<a href="http://www.hamiltoncontracting.com.au">www.hamiltoncontracting.com.au</a>
		Horne Ag Logistics Pty Ltd	Jeremy Horne	<a href="http://www.horneaglogistics.com.au">www.horneaglogistics.com.au</a>
		Pacific National (NSW) Pty Ltd	Paul Scurrah	<a href="http://www.pacificnational.com.au">www.pacificnational.com.au</a>
		SEAWAY Intermodal Pty Ltd	Bikash Ram	<a href="http://www.seawayintermodal.com.au">www.seawayintermodal.com.au</a>
Broker	Medium		6	
		Fox Commodities Pty Ltd	Paul Cochrane	<a href="http://www.foxcommodities.com.au">www.foxcommodities.com.au</a>
		Grain Brokers Australia	Jeff Winspear	<a href="http://www.grainbrokers.com.au">www.grainbrokers.com.au</a>
		Horizon Grain Brokers Pty Ltd	Ash Munro	<a href="http://www.horizongb.com.au">www.horizongb.com.au</a>
		Pure Grain Network Pty Ltd	Stuart Tighe	<a href="http://www.puregrain.com.au">www.puregrain.com.au</a>
		Quest Commodities	Jayne Barker	<a href="http://www.questcommodities.com.au">www.questcommodities.com.au</a>
		Rain Agribusiness	Ian Grellman	<a href="http://www.rainag.com.au">www.rainag.com.au</a>
		StoneX Financial	Stefan Meyer	<a href="http://www.intlfcstone.com">www.intlfcstone.com</a>
		Teague Australia Pty Ltd	Tim Teague	<a href="http://www.teague.com.au">www.teague.com.au</a>
	Sole Operator		8	
		A C Grain	Adam Clarke	<a href="http://www.acgrain.com">www.acgrain.com</a>
		Allied Grain Pty Ltd	Angus Wettenhall	<a href="http://www.alliedgrain.com.au">www.alliedgrain.com.au</a>
		Cogeser (Australia) Pty Ltd	Robert Luetolf	<a href="http://www.cogeser.com.au">www.cogeser.com.au</a>
		Farm Tender	Matt Henke	<a href="http://www.farmtender.com.au">www.farmtender.com.au</a>
		Lotema Pty Ltd	Todd Lees	<a href="http://www.lotema.com.au">www.lotema.com.au</a>
		Mallon Commodity Brokering	Ian Mallon	<a href="http://www.mcbrokering.com">www.mcbrokering.com</a>
		McDonald Pelz Australia	Stuart Richardson	<a href="http://www.mcdonaldpelz.com">www.mcdonaldpelz.com</a>
		Perkins Commodity Brokers	Craig Perkins	<a href="https://www.linkedin.com/in/craig-perkins-9a27211a">linkedin.com/in/craig-perkins-9a27211a</a>
		Sunrise Commodities	Scott Merson	<a href="http://www.sunrisecommodities.com.au">www.sunrisecommodities.com.au</a>
		Wardi Broking	Sam Ward	<a href="http://www.wardi.com.au">www.wardi.com.au</a>
		Woodside Commodities Pty Ltd	Hamish Steele-Park	<a href="http://www.woodcomm.com.au">www.woodcomm.com.au</a>
Corporate	Large		11	
		ASX	Ian Waddell	<a href="http://www.asx.com.au/grainfutures">www.asx.com.au/grainfutures</a>
		Australian Grain Technologies	Tristan Coram	<a href="http://www.agtbreeding.com.au">www.agtbreeding.com.au</a>
		Barrett Burston Malting Co.	Dean Ganino	<a href="http://www.bbmalting.com.au">www.bbmalting.com.au</a>
		BoortMalt Asia Pacific Pty Ltd	Simon Robertson	<a href="http://www.boortmalt.com">www.boortmalt.com</a>
		CIS Control Union Australia	Ashok Rana	<a href="http://www.cis-controlunion.com">cis-controlunion.com</a>
		Commonwealth Bank of Australia	Tom Morgan	<a href="http://www.commbank.com.au">www.commbank.com.au</a>
		Nestlé Australia	Paul True	<a href="https://www.nestle.com.au/en/aboutus/nestle-australiacompany">https://www.nestle.com.au/en/aboutus/nestle-australiacompany</a>
		NSW Ports	Campbell Mason	<a href="http://www.nswports.com.au">www.nswports.com.au</a>
		Sanitarium Health Food Company	Nathan Bullock	<a href="http://www.sanitarium.com.au">www.sanitarium.com.au</a>
		Symbio Laboratories	Kristian Just	<a href="http://www.symbiolabs.com.au">www.symbiolabs.com.au</a>
	Medium		10	
		AgriFood Technology	Doreen Fernandez	<a href="http://www.agrifood.com.au">www.agrifood.com.au</a>
		Amspec Australia	Lee Shilvock	<a href="http://www.amspecgroup.com.au">www.amspecgroup.com.au</a>
		Australian Superintendence Company (ASC)	Andrew Parry	<a href="http://www.austsupco.com.au">www.austsupco.com.au</a>
		Clear Grain Exchange	Nathan Cattle	<a href="http://www.cleargrain.com.au">www.cleargrain.com.au</a>
		Foss Pacific	Karl Hansal	<a href="http://www.foss.com.au">www.foss.com.au</a>
		HFW Australia	Stephen Thompson	<a href="http://www.hfw.com">www.hfw.com</a>
		Holding Redlich	Geoff Farnsworth	<a href="http://www.holdingredlich.com">www.holdingredlich.com</a>
		Intertek	Debbrah Millard	<a href="http://www.intertek.com">www.intertek.com</a>
		Mars Petcare Australia (t/a Mars Birdcare)	Kurt Sosinski	<a href="http://www.mars.com.au">www.mars.com.au</a>
		Oldendorff Carriers Melbourne	Allen Dewhirst	<a href="http://www.oldendorff.com">www.oldendorff.com</a>
		PSC Griffith Goodall Insurance Brokers	Mandy Gladman	<a href="http://www.pscgib.com.au">www.pscgib.com.au</a>
		SBA Law	Jeremy Rosenthal	<a href="http://www.sbalaw.com">www.sbalaw.com</a>
		SGS Australia	Trent Charlton-Maughan	<a href="http://www.au.sgs.com">www.au.sgs.com</a>
		T-Ports	Nathan Kent	<a href="http://www.tports.com">www.tports.com</a>
	Small		14	
		Advance Trading Australasia	Andrew Woodhouse	<a href="http://www.advance-trading.com.au">www.advance-trading.com.au</a>
		AEGIC	Courtney Draper	<a href="http://www.aegic.org.au">www.aegic.org.au</a>
		AgriDigital	Emma Weston	<a href="http://www.agridigital.io">www.agridigital.io</a>
		Ag Scientia	Lloyd George	<a href="http://www.agscientia.com.au">www.agscientia.com.au</a>
		AgVise (WA) Pty Ltd	Shane Sander	<a href="http://www.agvise.com.au">www.agvise.com.au</a>
		Aperture Ag Pty Ltd	Alex Campbell	<a href="http://www.apertureag.com.au">www.apertureag.com.au</a>
		Basis Commodities	Chris Whitwell	<a href="http://www.basiscommodities.com">www.basiscommodities.com</a>
		BSM Global	Jason Flemming	<a href="http://www.buysellmove.com">www.buysellmove.com</a>
		Cloudbreak Grain Marketing	Ed Scamps	<a href="http://www.cloudbreak.com.au">www.cloudbreak.com.au</a>
		Cropify	Anna Falkiner	<a href="http://www.cropify.io">www.cropify.io</a>
		Delta Agribusiness	Michael Parry	<a href="http://www.deltaag.com.au">www.deltaag.com.au</a>
		E P Integrated Commodities	Tracey Lehmann	<a href="http://www.epicbrokers.biz">epicbrokers.biz</a>
		Farmanco Marketing Pty Ltd	Donald McTaggart	<a href="http://www.farmanco.com.au">www.farmanco.com.au</a>
		FARMARCO Australia Pty Ltd	Rob Imray	<a href="http://www.farmarco.com.au">www.farmarco.com.au</a>
		Finesse Solutions	Malcolm Finlayson	<a href="mailto:malcolm@finessesolutions.com.au">malcolm@finessesolutions.com.au</a>
		Flexi Grain Pty Ltd	Jarrod Tonkin	<a href="http://www.flexigrain.com.au">www.flexigrain.com.au</a>
		Futari Grain Technology Services	Leah Petrie	<a href="http://www.futari.com.au">www.futari.com.au</a>
		Goldstar Commodities	Geoff Webb	<a href="http://www.goldstarcommodities.com.au">www.goldstarcommodities.com.au</a>
		Graintec Scientific	Lucas Anstiss	<a href="http://www.graintec.com.au">www.graintec.com.au</a>

		Grainx	Judi Morgan	<a href="http://www.grainx.com.au">www.grainx.com.au</a>
		Greenoaks Agriculture Pty Ltd	Richard Perkins	<a href="https://linkedin.com/in/richard-perkins-39090a3b/">https://linkedin.com/in/richard-perkins-39090a3b/</a>
		Harvestcheck Pty Ltd	Stephen Schumacher	<a href="http://www.harvestcheck.com.au">www.harvestcheck.com.au</a>
		Hay Plains Grain Storage Pty Ltd	Ron Harris	<a href="http://www.fellowsbulk.com.au/grainstorage">www.fellowsbulk.com.au/grainstorage</a>
		IKON Commodities	Ole Houe	<a href="http://www.ikoncommodities.com.au">www.ikoncommodities.com.au</a>
		Indyn	Rob Martin	<a href="http://www.indyn.net">www.indyn.net</a>
		Lachstock Consulting	Nick Carracher	<a href="http://www.lachstockconsulting.com.au">www.lachstockconsulting.com.au</a>
		Longbridge Commodities	Ben Langford	<a href="http://www.longbridge.com">www.longbridge.com</a>
		MarketAg Pty Ltd	Mark Martin	<a href="http://www.marketag.com.au">www.marketag.com.au</a>
		McMullen Consulting	Gerard McMullen	<a href="http://www.mcmullengrainagricultural.com">www.mcmullengrainagricultural.com</a>
		Mercari Pty Ltd	Daniel Marsh	<a href="http://www.mercari.com.au">www.mercari.com.au</a>
		Mirfak P/L	Josh Whelan	<a href="http://www.mirfak.com.au">www.mirfak.com.au</a>
		National Grower Register	Debbie Newmarch	<a href="http://www.ngr.com.au">www.ngr.com.au</a>
		OMIC Australia Pty Ltd	Koji Nakashima	<a href="http://www.omicaustralia.com.au">www.omicaustralia.com.au</a>
		Perten Instruments	Raul Ovelar	<a href="http://www.perten.com">www.perten.com</a>
		Pinion Advisory	Chris Heinjus	<a href="http://www.pinionadvisory.com">www.pinionadvisory.com</a>
		Planfarm Marketing Pty Ltd	Jerome Critch	<a href="http://www.planfarm.com.au">www.planfarm.com.au</a>
		Priag Marketing Pty Limited	Kevin Schwager	<a href="http://www.priag.com.au">www.priag.com.au</a>
		Primal Foods Group	Peter Longhurst	<a href="http://www.primalfoodsgroup.com">www.primalfoodsgroup.com</a>
		Profarmer and Australian Crop Forecasters	James Maxwell	<a href="http://www.nzx.com">www.nzx.com</a>
		Rise Agribusiness	Ian Dalgliesh	<a href="http://www.riseagri.com.au">www.riseagri.com.au</a>
		Saputo Dairy Australia	Ashley Denishensky	<a href="http://www.saputo.com">www.saputo.com</a>
		SGA Solutions Pty Ltd	David Hudson	<a href="https://linkedin.com/in/david-hudson-8240b913">linkedin.com/in/david-hudson-8240b913</a>
		Sizer & Cogill (t/a NQ Bulk)	Chris Sizer	<a href="http://www.sizercogill.com.au">www.sizercogill.com.au</a>
		Ten Tigers	Chris Tonkin	<a href="http://www.tentigers.com.au">www.tentigers.com.au</a>
		TE Storage & Logistics Pty Ltd	Tom Hage	<a href="http://www.testorage.com.au">www.testorage.com.au</a>
		TT Club Mutual Insurance	Rhys Richards	<a href="http://www.ttclub.com">www.ttclub.com</a>
		Ultimate Global Trading Pty Ltd	Andrew Alexopoulos	<a href="http://www.ultimategt.com.au">www.ultimategt.com.au</a>
		Wattletree Consulting	Joe Righetti	<a href="http://www.wattletree.net.au">www.wattletree.net.au</a>
		Windarra Grain Storage	Jessica Russ	
			49	
International Affiliate		CIS Commodity Inspection Services	Paul Schweitzer	<a href="http://www.cis-inspections.com">www.cis-inspections.com</a>
Industry Association			1	
		Grain Growers Limited (GGL)	Shona Gawel	<a href="http://www.graingrowers.com.au">www.graingrowers.com.au</a>
		Grain Industry Association of WA (GIWA)	Peter Nash	<a href="http://www.giwa.org.au">www.giwa.org.au</a>
		Grain Producers Australia Ltd (GPA)	Colin Bettles	<a href="http://www.grainproducers.com.au">www.grainproducers.com.au</a>
		NSW Farmers Association	Elen Welch	<a href="http://www.nswfarmers.org.au">www.nswfarmers.org.au</a>
Merchant Association		Stock Feed Manufacturers' Council of Australia (SFMCA)	Duncan Rowland	<a href="http://www.sfmca.com.au">www.sfmca.com.au</a>
			5	
		Grain Industry Association of SA (GIASA)	Marie Cunningham	<a href="http://www.giasa.org.au">www.giasa.org.au</a>
		Grain Industry Association of VIC (GIAV)	Colin Peace	<a href="http://www.giav.com.au">www.giav.com.au</a>
		Grain NSW	Joanne Ware	<a href="http://www.grainnsw.com.au">www.grainnsw.com.au</a>
		Queensland Agricultural Merchants (QAM)	Rob Imray	<a href="http://www.qam.org.au">www.qam.org.au</a>
			4	