

30th May 2025

Department of Agriculture, Fisheries & Forestry
Parliament House
Canberra ACT 2600
Via email: offshoretreatments@aff.gov.au

RE: The Future of Biosecurity Fumigation Technology

To the Secretariat,

Thank you for the opportunity to provide the Department of Agriculture Fisheries and Forestry (DAFF) feedback on *new technologies and regulatory requirements relating to monitoring fumigations*. Grain Trade Australia (GTA) have concerns with the direction that is outlined in the DAFF discussion paper and wish to share these concerns to allow them to be considered in the consultation process.

1. About GTA

GTA is a national association and is the focal point for the commercial grain industry within Australia. **GTA members are the supply chain managers, marketeers, consumers and exporters of Australia's grain.** 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 is an active member of the Grain and Plant Products Export Industry Consultative Committee (GPPEICC) and through our close association with the National Working Party on Grain Protection have been instrumental in working with DAFF to providing stewardship to industry regarding the use of chemicals in the agricultural supply chain.

2. New Technology for the Monitoring of Fumigations

The Australian grain industry over many years has earned a well-deserved reputation in international markets for high quality product and quality assurance processes to meet importing country requirements. Whilst recognising there is always opportunities to improve performance across the supply chain this concept of DAFF mandating and prescribing the uptake by industry of new technology is questioned and should be carefully considered and discussed across all relevant sectors.

You may be aware GTA and DAFF have been in discussion regarding fumigation protocols on several occasions both at GPPEICC, focussed Industry Working Groups and recent regional forums. We are therefore surprised that this proposed option has never been raised for consideration and industry engagement.

The grain industry is not averse to new technology and will adopt and utilise it based on its commercial value as a primary consideration, and ensuring importing country quarantine requirements are met. Whereas a mandatory regulatory requirement to utilise technology to address what may be isolated phytosanitary breaches is of concern to GTA and its members as it forces unnecessary cost and regulations into the supply chain.

Mandatory uses of technology can be extremely costly, difficult to introduce, maintain and operate. It is not appropriate to prescribe and push this onto any industry. If DAFF has an issue with compliance including fraudulent behaviour, then as we have said many times before and seemingly to no avail, DAFF should address those particular individuals rather than penalising entire sectors with additional costs and burdens. We are also of the view that DAFF taking compliance or legal action against fraudulent activity and making this known to industry, will act as a deterrent to others.

From a grain export perspective there has been no evidence presented to demonstrate a systemic breakdown in the grain industry to warrant the proposal of mandating specific electronic fumigation equipment. This proposal does not seem proportionate to any demonstrated or perceived risk.

As mentioned, the grain industry is not adverse and will adopt new technology based on its commercial value as a primary consideration and need to meet importing country requirements. As your discussion paper notes, industry and exporters have reputational and commercial risks, when trade falters, and are therefore naturally incentivised to ensure effective fumigation treatment and compliant consignments.

GTA is always happy to engage with DAFF where the department can reduce its cost to serve industry through technology advances. We also suggest this topic be addressed formally through the GPPEICC.

3. Conclusion

Thank you again for the opportunity to provide feedback.

Please do not hesitate to contact me should you require further information on this and any other grain industry issues.

Yours faithfully,



Pat O'Shannassy
Chief Executive Officer