

10th September 2025

Mr Timothy Yeend
Independent Reviewer – EMDG Program
Austrade
Via Email: EMDGreview@austrade.gov.au

Subject: Submission to the Independent Review of the Export Market Development Grants (EMDG) Program

Dear Mr Yeend,

Grain Trade Australia Ltd (GTA) appreciates the opportunity to provide feedback to the Independent Review of the Export Market Development Grants (EMDG) program. We acknowledge the vital role that EMDG plays in enabling small and medium enterprises and representative bodies to enter, build, and diversify international markets.

Grain Trade Australia (GTA) is a national association and is the focal point for the commercial grains industry within Australia. The role of GTA is to provide a framework (including the Australian Grain Industry Code of Practice) across industry to facilitate and promote the trade of grain. GTA Members are the 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 Trade Rules.

GTA Members are drawn from all sectors of the grain value chain from production to domestic end users and exporters. GTA has over 290 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 [here](#) and attached.

Positives and recent improvements

We welcome the continuous improvements made to the program in recent years, particularly:

- The increase in average grant sizes to around \$53,000 per annum, which provides more meaningful support to applicants undertaking substantial international marketing activities;
- The consultative approach adopted in refining the program from Round 1 to Round 4, which has shown responsiveness to stakeholder feedback;
- The program's enduring role as a cornerstone of export development policy, helping representative bodies like GTA to support our members and industry promotion in overseas markets.

Areas of concern and opportunities for improvement

- 1) *Generic industry promotion and member contributions:*
Austrade's decision to require representative bodies to deduct all member contributions from claims for substantially or wholly generic/pre-competitive industry promotion activities has materially reduced the scope and scale of pre-competitive activities undertaken previously with EMDG program support. For example, GTA could claim the gross cost of leading industry in-market conferences and events such as AGIC Asia (less non-member contributions). This change will increase the cost and risk associated with these events, which will disincentivise member co-funding, reduce leverage of industry contributions, and ultimately diminish our ability to promote the Australian grain industry overseas.

- 2) *Prepayments across financial years:*
The recent policy reversal rejecting prepayments at the end of a financial year for activities in the following year creates unnecessary complexity for milestone reporting. Events such as the Australian Grain Industry Conference (AGIC), which naturally straddle July–June reporting periods, are now more difficult to claim, despite prepayments being normal commercial practice for securing venues and suppliers.
- 3) *Restriction of claimable airfares:*
The rule limiting claimable airfares to economy class only—and requiring a current economy-fare benchmark even when other fare classes are booked—creates an administrative burden with little program benefit. It is an unavoidable fact, that undertaking marketing activities overseas involves extended and long-haul travel, within tight timeframes, limiting time for rest. If an applicant has been approved to receive the grant amount, there should be discretion and flexibility as to how to allocate eligible marketing travel costs in order to optimise the successful impact of the program.
- 4) *Milestone reporting deadline (15 June):*
For the 2025/26 program year, Austrade now requires milestone reports to be lodged by 15 June 2026, i.e., before the end of the financial year. This is historically unprecedented in the 50-year history of the program and will force applicants to prepare acquittals in April–May while excluding legitimate expenses incurred between 15 and 30 June. The benefits to be gained are not clear. It appears to be for administrative convenience to government only and risks disadvantaging those of us who plan and spend according to the standard financial year.
- 5) *Administrative consistency and transparency:*
Taken together, these changes represent sharp departures from longstanding practice, introduced without sufficient notice, consultation or clear communication of any benefits. This will serve to undermine applicant confidence in the program, increases administrative effort, and creates financial uncertainty when making long-lead commitments for export promotion activities.
- 6) *Restriction of claims to SME members only*
Austrade’s new rule limits claims to members under \$20 million turnover — an impractical and unreasonable restriction for several reasons:
 - Many representative bodies, including GTA, have members both above and below the \$20 million threshold. Representative bodies typically do not know the turnover of individual members and requiring them to survey or apportion expenditure is both unrealistic and administratively burdensome.
 - The \$20 million threshold is set at a level that does not reflect the realities of agricultural commodity exporting. In grain, \$20 million of turnover currently equates to roughly 60kt of grain — about one export cargo — which is far below the scale of a viable grain exporting business in Australia. Further whether a \$20 million dollar turnover threshold for a grain exporter may be met can vary depending on market prices for the grain, despite the underlying business being the same. The definition proposed by Austrade appears naively narrow and more suited to boutique retail enterprises than commodity exporters.
 - No guidance has been issued on how Austrade intends to enforce this rule. Will expenditure need to be apportioned according to membership profiles? Will representative bodies have to survey members’ turnover? The lack of clarity creates uncertainty for program planning in 2025/26.

Overall, this measure represents another example of added red tape that increases compliance costs for applicants while also raising regulatory burdens for government administrators. The more complex the rules, the more resources are absorbed by process management rather than the intended purpose of the scheme — namely, supporting export promotion.

We believe such a rule will have a detrimental impact on the overseas promotion of the Australian grain exports and will have downstream negative impacts on returns to growers.

Recommendation: Remove or modify this rule so that representative bodies are not penalised for having members above the \$20 million turnover threshold. Alternatively, provide clear exemptions for reputable industry associations, recognising their role in promoting whole-of-sector export outcomes.

- 7) *Restriction to “new” export marketing and promotional activities:*
Although intended to encourage innovation, in practice the rule only adds unnecessary complexity and red tape. Representative bodies such as GTA often deliver recurring promotional events and activities (e.g., AGIC Asia) which are proven to be effective.

Continuity and repetition of some activities can be fundamental to building relationships, and entrench learning and understanding with our targeted customers. These activities may not meet Austrade’s narrow definition of “new,” yet they continue to deliver considerable value and strong export outcomes year after year.

This requirement risks penalising continuity and proven effectiveness. At a time when Government has stated its priority to improve productivity and reduce bureaucratic obstacles for business, this measure and its complexity has the opposite effect by layering additional compliance burdens on representative bodies as well as government.

Recommendation: Remove or relax this restriction so that representative bodies can claim legitimate export marketing and promotional activities regardless of whether they are “new,” provided they clearly deliver export outcomes.

Conclusion

Overall, GTA strongly values the EMDG program and acknowledges the important support it provides to our members and the broader grain industry. With modest adjustments—particularly reinstating the previous treatment of generic promotion, accepting legitimate prepayments, removing unnecessary airfare restrictions, and restoring sensible milestone reporting deadlines, and avoiding red tape and compliance complexity—the program can continue to deliver maximum value to industry and to government objectives.

All these measures described above are new to EMDG with Round 4 and are unnecessary, time-consuming, and counterproductive to helping representative bodies promote the exports of their members. Eliminating them would not add to the cost of the EMDG program as maximum grant amounts for applicants have already been set. They merely require policy changes by Austrade or the exercise of discretions which have previously been applied. This would substantially simplify the milestone reporting process, facilitate faster processing by Austrade, and enable resources to be devoted to helping members to achieve export outcomes, as desired by the EMDG program.

We thank you for considering our submission and reaffirm that GTA views EMDG as a highly valuable and effective program in supporting the international presence and strength of Australian grain industry.

Yours faithfully,



Pat O'Shannassy - CEO
Grain Trade Australia Ltd