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10th November 2025

Department of Agriculture, Fisheries and Forestry. PO Box 858, CANBERRA ACT 2601

Attention: Consultation Secretariat - Via 'Have your Say' submission portal

# The National Bioenergy Feedstock Strategy

**Submission from Grain Trade Australia** 

### 1. About GTA

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 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 285 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 <a href="here">here</a> and attached.

GTA welcomes the opportunity to make this submission to the consultation on the Department's National Bioenergy Feedstock Strategy.

## 2. Introduction

The Australian grain industry is a major contributor to regional economies and national export revenue. In 2024–25, the industry's value was estimated at \$25.8 billion, including \$22.4 billion in exports, making it one of the highest-value sectors in Australian agriculture and accounting for over 25% of the nation's total agricultural production.

For 2024–25, combined summer and winter crop production is forecast to reach 64.5 million tonnes, following three consecutive years of record harvests — 59.9 million tonnes in 2020–21, 68.0 million tonnes in 2021–22, 73.9 million tonnes in 2022–23, and 51.3 million tonnes in 2023–24.

Canola production in 2024-25 was 6.1 million tonnes, having peaked at 8.4 million tonnes in 2022-23. Canola value (farm gate) was \$A4.3 billion in 2024-25 with a peak of \$A6.6 billion in 2022-23.

Trade and an efficient supply chain are essential to the success of the Australian grain industry and to the prosperity of regional communities. The industry is well positioned to serve key international markets, particularly in South-East Asia. However, the grain supply chain remains heavily dependent on imported liquid fuels. GTA supports the development of sustainable and renewable fuel alternatives as part of Australia's broader carbon transition.

## 3. Opportunities and Challenges for Feedstocks

The Australian Grain Supply Chain and Market Dynamics

The Australian grain supply chain is sophisticated, market-driven, and highly responsive to changes in supply, market shocks, and evolving global demand. GTA members facilitate grain trade domestically and internationally, connecting numerous domestic demand points with around 100 export market destinations through both containerised and bulk vessel shipments.

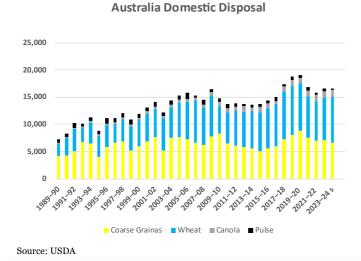
Each year Australia exports approximately 70–75% of its total grain production into a highly competitive global market. Consequently, the industry is acutely aware of the risks and costs associated with trade barriers—both tariff and non-tariff—as well as the effects of government policies and political interventions, such as subsidies, in other nations. For this reason, the Australian grain industry consistently advocates for **risk-based**, **science-based**, **and rules-based global trade frameworks** that promote efficient trade and global food security.

#### Domestic Demand and Market Structure

While export markets remain vital, the domestic grain market also plays a critical role within the overall supply chain. In fact, the largest single consumptive market for Australian grain is the domestic market. Domestic demand for grain has grown significantly over recent decades, with a five-year average of 17.3 million tonnes and a peak of 18.8 million tonnes in 2019–20 (see Figure 1). Domestic demand is largely concentrated along Australia's east coast.

Domestic consumers include flour millers, starch processors, oilseed processors, maltsters, stockfeed manufacturers, and whole-grain feed buyers. In years of average or above-average production, these consumers generally have ample access to grain supply, purchasing grain at prices aligned with export parity.

Figure 1. Domestic Grain Demand (MT)



Recognising farmers select crop types based on their agronomic programs and a desire to maximise or optimise their gross margin per hectare, domestic buyers may need to offer prices above export parity to secure adequate supply of specific grains.

Australia's industry through Sustainable Grain Australia and CBH Grain facilitates certification of Australian canola grower's production as sustainable under the International Sustainability and Carbon Certification (ISCC) scheme.

Australian farmers produce both GM and non-GM canola. The Australian grain supply chain is experienced with segregating and managing distribution to the market of these products through the industry agreed Market Choices Framework managed by GTA.

The factors discussed above means canola is well placed for immediate consumption as a saleable biofuels consumptive feedstock. Wheat and barley can also be utilised as starch-based feedstocks for bioethanol production.

# **Emerging Opportunities**

The potential for increased domestic demand for oilseeds and other feedstocks from the low-carbon liquid fuel (LCLF) or bioenergy sectors presents a new and positive development for the Australian grain industry. Beyond supporting the transition to sustainable fuel production, these processing facilities should generate expanded domestic demand for grain and oilseeds, strengthening both local and national trade opportunities, whilst adding economic value to the Australian economy.

Australia's grain supply chain is well-equipped to manage the commercial and logistical challenges associated with balancing domestic and export demand. The addition of new LCLF-related demand will further enhance market activity, diversification and supply chain efficiency.

Immediate LCLF Feedstock Opportunity - Australian Canola

Australian canola is sought after globally for its use as a food-grade oil, for biofuel production and as a stock feed. Australian canola production is on the rise, averaging more than six million metric tonnes annually, making up 30 per cent of the world canola export trade.

Most of production is exported with domestic consumption fluctuating, and averaging around 25% of production (see Figure 2).

Canola - Domestic Consumption vs Exports

100%
90%
80%
70%
60%
50%
40%
10%
0%

20%
10%
0%

Pomestoc Exports

Figure 2 – Canola – Exports vs Domestic consumption

Source: ABARES

Canola is well known for producing one of the world's healthiest vegetable oils and its importance as an environmentally friendly biofuel is growing. Australian canola is grown using sustainable farming systems and is certified as meeting sustainability criteria for market access to Europe for use in biofuel. As a result, Australia is a major supplier of canola to the European Union (EU) biodiesel market with over 3mmt exported annually to the EU.

#### Social licence

In terms of social licence and community concerns, there may be some well-intended, but in our view largely unfounded concerns around utilising agricultural productive capacity for fuel feedstocks, ie the "food v feed v fuel" issue. In GTA's view this issue should be openly addressed, as on an objective level, the issues are complementarity, on several levels including:

- Utilising biofuels is an important component of reducing greenhouse gas (GHG) emissions and therefore impact (negatively) on climate change, which can often impact developing countries and communities disproportionately
- Much of the area already utilised in Australian for canola production is already being utilised in biofuel production (with 2.5-3 million tonnes of canola exported to Europe for bio-fuel production). Therefore, producing biofuels domestically is more a redistribution of demand points, and in effect will serve to reduce emissions from less global shipping as well as value adding within Australia.
- Canola seed itself is not a direct human consumption food. Increasing canola "crush" (ie extracting oil and protein meal) through higher crush demand will result in increased canola meal, that can serve as protein source for animal feed (both domestically and in export markets).
- Globally and within Australia with scientific research, extension and access to innovative technology, producers have demonstrated their willingness to adopt new practices and technology to sustainability increase agricultural productivity.
- Globally, there is not a shortage of grains and oilseeds *per se*, however efficient open trade frameworks remain important to create efficient economic conditions to support movement of grains and oilseeds to where they are needed.

#### Production Signals & Supply

Having flexibility and opportunity for farmers to alternate between different crops and enterprises within their business is a fundamental mitigate for managing risk.

As described by the Grains Research and Development Corporation <u>Optimising returns from cropping - the economics of production</u> there are many factors to consider in the choice of what crops to grow. The primary objective is to optimise gross margin per hectare. Within this objective, there are several factors including:

- Production costs (eg seed, fuel, fertiliser)
- Agronomic and disease concerns
- Soil conditions and soil health
- Market signals including supply and demand conditions
- Climate conditions
- Supply chain costs and market access
- Risk factors such as frost susceptibility and plant resilience

The Feedstock Strategy should consider the grower production decisions such as market drivers as they have the propensity to impact forecast canola production.

## 4. Policy Considerations

Global grain and oilseed markets are highly competitive. An open rules-based trade framework is important for efficient trade and global food security.

The Australian grain market is among the most open and least subsidised in the world. Australian farmers and trade participants are market-driven, and highly responsive to changes in supply, market shocks, and evolving global demand.

GTA welcomes additional demand from an emerging bioenergy sector. That said, in terms of policy settings and any potential government interventions with regards to agricultural production and supply of grains and oilseeds to a bioenergy sector, Australia should maintain a non-distortive, market led approach consistent with Australia's well founded global reputation and advocacy for open and non-subsidised agricultural markets.

Any alteration to current Australian grain and oilseed market frameworks risks reducing efficiency, constraining national productivity, and undermining Australia's reputation as a global advocate for transparent, science-based, and minimally interventionist trade policy. This is critically important, given Australia exports around 75% of its grain and oilseed production.

GTA is currently not in a position to comment on bio-fuel demand side policy settings.

GTA notes some stakeholder discussion on possibly establishing feedstock accumulation hubs, potentially with Government support or intervention. We seek to highlight there is an extensive existing supply chain and accumulation points for canola (and other grains) in Australia. GTA would not support government policy intervention in special feedstock hubs or accumulation points. We believe this would be distortive and create economic inefficiency, for example potentially rendering existing viable storage facilities as unviable

It is important to the value of canola (and other grains) to maintain optionality and flexibility to its end-use and demand point. This is best done and will produce value and efficiencies, through integration of storage and logistics of canola with potential for LCLF processing within the broader bulk grain supply chain. It is a core role of GTA members, as supply chain managers to accumulate, store and merchandise grain including that which may be utilised for prospective LCLF processing.

## 5. Supply Chain Investment for Competitiveness and Growth

The future success of Australia's grain industry is dependent on an efficient and competitive supply chain. To this end GTA has developed an innovative growth and investment strategy for the grain supply chain called Modernising the grain supply chain. This strategy is set out with four strategic pillars focusing on:

- · skills and capability
- quality and market access
- technology
- transport and logistics.

Australia must compete and develop competitive advantage on both the grain quality/value and the domestic and export supply chain fronts. GTA would contend that in seeking to develop policy to potentially support the introduction of a bioenergy sector and LCLF production factors such as the efficiency of the grain supply chain, should also be considered to improve competitiveness and extract economic benefits for all participants, including rural and regional economies. Policy to support efficient grain supply chains should however not be restricted to the LCLF sector but should encompass all demand points and supply chains.

Improving competitiveness together with grain and oilseed supply chain efficiency will increase the value of every tonne that moves through it, regardless of end demand or consumption point. This means an increase in national productivity and will be beneficial to industry, government and the LCLF value proposition.

#### 6. Conclusion

GTA supports the development of this National Bioenergy Feedstock Strategy as developing a bioenergy industry in Australia will maximise the economic and industrial benefits of the shift to clean energy and reducing GHG emissions.

This strategy as part of its process must consider the impact of new domestic demand opportunities for Australian grain and oilseeds and what this may mean to market signals and to grower production decisions. As discussed, any new domestic consumption points must have equal and not preferential access to the existing grain trading market. Any Government support for the bioenergy industry should focus on support for the LCLF production and refining sector in order to avoid distortions in open access and competitive grain markets.

In its review Government should also consider aspects of the supply chain to maximise the value and performance of the proposed bioenergy industry supply chain.

GTA remains open to engage further and participate in both industry driven and Government initiated policy development. GTA's expertise and broad membership across the grains and oilseeds supply chain, means it is well placed to provide a practical perspective on the grain and oilseed supply chain impacts of the developing LCLF industry.

We thank you for the opportunity to make this submission. We ask that you keep us updated on developments and progress in this important review.

Please do not hesitate to contact GTA should you have any queries or seek further assistance.

Yours faithfully,

Pat O'Shannassy

CEO, Grain Grade Australia



Membership List as of 8 October 2025

ember Type	Member Level	Account Name	<b>Primary Contact</b>	Website
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		GrainCorp Australia	Robert Spurway	www.graincorp.com.au
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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	excelfarms.com.au
Export Import Australia	Dhanesh Kumar	www.exportimportaustralia.com.au
Export Trading Group Australia Pty Ltd	Cassandra Tipler	www.etgworld.com
Fanmac Logisitics Pty Ltd	Chris Fanning	www.fanmacag.com.au
Feed Central Pty Ltd	Tim Ford	www.feedcentral.com.au
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Grain Link WA Pty Ltd	Andrew Goyder	www.grainlink.com.au
Grenfell Commodities Pty Ltd	Peter Gordon Mawhinney	www.grenfellcomm.com.au
GV Grain & Fodder	Joanne Harry	linkedin.com/in/joanne-harry-707119116
Harrold Pastoral Co	Patrick Harrold	
Harwood Grains & Stockfeeds	Paul Harwood	www.harwoodgrains.com.au
Horizon Commodities Pty Ltd	Aaron Jones	www.horizoncommodities.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.kennettrural.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://mahonystransport.com.au
Mallon AgCommodities	Blake Mallon	mallonag.com.au
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	Palwinder Singh	www.marinacommodities.com
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	Indyn	Rob Martin	<u>www.indyn.net</u>
	Lachstock Consulting	Nick Carracher	www.lachstockconsulting.com.au
	MarketAg Pty Ltd	Mark Martin	www.marketag.com.au
	McMullen Consulting	Gerard McMullen	www.mcmullengrainagricultural.com
	National Grower Register	Debbie Newmarch	www.ngr.com.au
	OMIC Australia Pty Ltd	Koji Nakashima	www.omicaustralia.com.au
	Perten Instruments	Raul Ovelar	www.perten.com
	Pinion Advisory	Chris Heinjus	www.pinionadvisory.com
	Planfarm Marketing Pty Ltd	Jerome Critch	www.planfarm.com.au
	Priag Marketing Pty Limited	Kevin Schwager	www.priag.com.au
	Profarmer and Australian Crop Forecasters	James Maxwell	www.nzx.com
	Saputo Dairy Australia	Ashley Denishensky	www.saputo.com
	SGA Solutions Pty Ltd	David Hudson	linkedin.com/in/david-hudson-8240b913
	Sizer & Cogill (T/A NQ Bulk)	Chris Sizer	www.sizercogill.com.au
	Ten Tigers	Chris Tonkin	www.tentigers.com.au
	TE Storage & Logistics Pty Ltd	Tom Hage	www.testorage.com.au
	TT Club Mutual Insurance	Rhys Richards	www.ttclub.com
	Wattletree Consulting	Joe Righetti	www.wattletree.net.au
	Windarra Grain Storage	Jessica Russ	www.wattietree.net.au
	Williama Grain Storage	42	
nternational Affiliate	CIS Commodity Inspection Services	Paul Schweitzer	www.cis-inspections.com
iternational Armiate	cis commounty inspection services	1	www.cis-inspections.com
ndustry Association	Grain Growers Limited (GGL)	Shona Gawel	www.graingrowers.com.au
naustry / tosociation	Grain Industry Association of WA (GIWA)	Peter Nash	www.giwa.org.au
	Grain Producers Australia Ltd (GPA)	Colin Bettles	www.grainproducers.com.au
	NSW Farmers Association	Elen Welch	www.nswfarmers.org.au
	Stock Feed Manufacturers' Council of Australia (SFMCA)	Ellen Buckle	www.sfmca.com.au
	Stock reed Mandiacturers Council of Australia (SI MCA)	5	www.simca.com.au
Merchant Association	Grain Industry Association of SA (GIASA)	Marie Cunningham	www.giasa.org.au
	Grain Industry Association of VIC (GIAV)	Georgie van Beek	www.giav.com.au
	Grain NSW	Joanne Ware	www.grainnsw.com.au
	Queensland Agricultural Merchants (QAM)	Rob Imray	www.qam.org.au
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