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19th December 2025

Department of Infrastructure, Transport, Regional Development, Communications and the Arts Department of Climate Change, Energy, the Environment and Water.
PO Box 6021
Parliament House
CANBERRA ACT 2600

Via email: <a href="mailto:lclfconsultation@infrastructure.gov.au">lclfconsultation@infrastructure.gov.au</a>

# **Cleaner Fuels Program**

#### **Submission from Grain Trade Australia**

#### 1. About GTA

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Grain Trade Australia (GTA) is the national association representing the commercial grain industry in Australia. GTA provides the industry-wide framework that underpins grain trade, including the Australian Grain Industry Code of Practice, Grain Trading Standards and Trade Rules.

GTA members are responsible for more than 95 per cent of Australia's grain storage and freight movements each year, and over 95 per cent of grain contracts executed in Australia reference GTA standards. GTA's membership spans the full grain value chain, from growers to domestic processors and exporters, and includes more than 295 organisations ranging from regional family businesses to large national and international trading, storage and handling companies. A full list of GTA members is attached to this submission.

#### 2. Context and importance of the grain industry

The Australian grain industry is a major contributor to regional economies and national export earnings. In 2024–25, the industry was valued at an estimated \$25.8 billion, including \$22.4 billion in exports, representing more than 25 per cent of Australia's total agricultural production.

Grain production is forecast at 64.5 million tonnes in 2024–25, following several years of historically strong output. Canola production remains a significant contributor, with farm-gate value of \$4.3 billion in 2024–25. The industry's success is underpinned by global competitiveness and an efficient, reliable supply chain. However, the grain supply chain is heavily dependent on imported liquid fuels, particularly diesel for heavy transport. As such, fuel security, affordability and availability are critical to the sector's resilience and to the prosperity of regional communities.

GTA supports Australia's transition to lower-carbon energy systems and recognises the role that low-carbon liquid fuels (LCLF) can play in supporting decarbonisation while maintaining supply-chain efficiency.

# 3. Overall position on the Cleaner Fuels Program

GTA welcomes the Australian Government's \$1.1 billion Cleaner Fuels Program and supports its objectives to strengthen Australia's sovereign liquid fuel capability, improve fuel security, and encourage domestic production of low-carbon liquid fuels.

From the grain industry's perspective, the Program has the potential to:

- reduce exposure to global fuel supply disruptions and strengthen the resilience of critical agricultural supply chains;
- · create new domestic demand opportunities for Australian agricultural feedstocks; and
- deliver broader regional economic benefits.

GTA considers the Program's stated objectives to be appropriate, well-founded and aligned with the needs of fuel-reliant industries such as grain.

### 4. Principles to guide policy design

Rather than responding to individual technical questions, GTA encourages the Cleaner Fuels Program to be guided by the following overarching principles.

#### a. Fuel neutrality and market-driven outcomes

The Program should remain fuel-neutral and technology-agnostic wherever possible. All low-carbon liquid fuels that are commercially viable, demanded by end users, and consistent with the Program's objectives should be eligible.

From an operational perspective, the grain industry's primary fuel requirement is diesel, given the reliance on heavy transport. Renewable diesel is therefore of particular relevance. However, GTA also recognises that sustainable aviation fuel (SAF) may offer stronger early demand signals due to aviation sector decarbonisation commitments and may be well placed to support early market development.

Attempting to prioritise or de-prioritise fuels, sectors or production pathways carries risk, given uncertainty around future demand, technology development and costs. Market signals and the goal of improved fuel security should be allowed to guide outcomes over time.

#### b. Strategic assessment beyond lowest cost

While cost effectiveness is important, GTA does not support an assessment framework that prioritises projects solely on the basis of lowest cost.

A robust but practical assessment framework should consider a broader set of criteria, including:

- contribution to fuel security and sovereign capability;
- relevance to critical sectors such as agriculture and freight;
- lifecycle emissions performance;
- availability and sustainability of feedstocks;
- scalability and long-term viability; and
- regional and supply-chain benefits.

Such an approach better aligns with the Program's strategic objectives and will maximise long-term value for taxpayers.

#### c. Simple, predictable production support

GTA supports a production support mechanism that is simple, transparent and predictable. Overly complex mechanisms risk increasing administrative burden, discouraging participation and delaying investment decisions.

Simplicity will be particularly important during the early stages of the LCLF industry development.

# d. Balanced approach to caps, exports and project scale

Caps on production support can play an important role in managing taxpayer exposure, but they should be flexible across the Program, be based on merit for individual projects, with all subject to review, particularly while the domestic LCLF industry is developing.

Similarly, GTA supports an efficient market that allows exports once domestic supply needs and fuel-security objectives are met. Export opportunities can be important for project viability, provided there is transparency around market outcomes.

Minimum facility size thresholds should not be used as an eligibility filter. Project merit should be assessed on strategic value, emissions outcomes and commercial viability rather than scale alone.

### e. Technology pathways and innovation

Both established and emerging production pathways should be allowed to compete under the Program. While mature pathways may offer lower risk during industry establishment, emerging technologies may deliver longer-term benefits and innovation. Maintaining flexibility avoids locking in sub-optimal outcomes.

First-of-a-kind facilities are likely to face higher upfront risk, and a combination of production support and capital assistance may be appropriate to encourage early investment.

## f. Sustainability and carbon accounting

Carbon intensity thresholds and sustainability criteria should be a consideration as part of the Program, but they must be designed carefully to avoid excluding fuels that deliver genuine emissions reductions or constraining early industry development.

GTA strongly favours:

- simple and transparent carbon accounting methodologies;
- caution in the use of complex and uncertain measures such as indirect land-use change; and
- reliance on established domestic and international sustainability certification schemes rather than creating new systems.

Recognised schemes such as ISCC and Sustainable Grains Australia provide credible, efficient verification frameworks and support both domestic and export market acceptance.

## g. Whole-of-supply-chain focus

Successful domestic LCLF production will require more than support for production facilities alone. Complementary measures should address:

- improved logistics and transport infrastructure;
- feedstock availability and innovation;
- demand-side measures to stimulate market uptake; and
- policy alignment across fuel standards, procurement, taxation and investment frameworks.

A coordinated and predictable Government policy environment will be essential to support capital investment decisions and enable the LCLF industry to establish.

#### 5. Conclusion

Grain Trade Australia supports the Cleaner Fuels Program and the Government's consideration of domestic low-carbon liquid fuel production. The Program has the potential to strengthen fuel security, support regional economies, and create new demand opportunities for Australian agriculture.

GTA encourages a principled, flexible and market-aware approach to policy design that balances cost, emissions outcomes and strategic national interests. Consideration of the full supply chain and emerging technologies will be critical to maximising the Program's long-term value and effectiveness.

We thank the Government for the opportunity to provide this submission and welcome ongoing engagement as the Program develops.

Please do not hesitate to contact GTA should further information or clarification be required.

Yours faithfully,

Pat O'Shannassy

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CEO, Grain Grade Australia



Membership List as of 25 November 2025

Member Type	Member Level		Primary Contact	Website
Ordinary Member	A1		Philip Hughes	https://www.bunge.com/Australia
			Ben Macnamara	www.cbh.com.au
		GrainCorp Australia	Robert Spurway	www.graincorp.com.au
		3		
	A3	Cargill Australia	Zsolt Kocza	www.cargill.com.au
		1		
	A4		Darryl Borlase	www.adm.com
		Louis Dreyfus Company	David Johnson	www.ldc.com
		2		
	B1	Arrow Commodities	Dom Vanzella	www.arrowcom.com.au
		Australian Grain Export Pty Ltd	Tim Martin	www.australiangrainexport.com.au
		CHS Broadbent	Steve Broadbent	www.broadbentgrain.com.au
		George Weston Foods	Michael Schmidt	www.gwf.com.au
		Manildra Group	Peter Sloan	www.manildra.com.au
		Riordan Grain Services	Jim Riordan	www.riordangrains.com.au
		6		
	B2	Centre State Exports	Nick Lange	www.centrestateexports.com.au
		ETG Commodities	Peter McMeekin	www.etgworld.com
		Inghams Enterprise Pty Ltd	Matt Clarke	www.inghams.com.au
		J K International Pty Ltd	Sandeep Mohan	www.jki.com.au
		Ridley Agriproducts	Reagan Stroud	www.agriproducts.com.au
		Riverina (Australia)	Jon Mulally	www.riverina.com.au
			Matt Albion	www.wilmargavilon.com
		7		M 22
	B3	Allied Pinnacle	Brett Duczmal	www.alliedmills.com.au
	30		Michael Aikman	www.brahmancommodities.com.au
			Sarah Pan	www.cofcointernational.com
			Barry Mansfield	www.demetergrains.com.au
		K M & W M Kelly & Sons	Matt Kelly	www.kellygrains.com.au
		Quadra Commodities  Oubo Logistics (SR) Btv Ltd (T/A Oubo Agri)	Robin Cassar	www.quadra.com
		Qube Logistics (SB) Pty Ltd (T/A Qube Agri)	Jeremy Brown	www.qube.com.au
		Robinson Grain Trading	Adam Robinson	www.robinsongrain.com.au
	24	8		
	C1	Agracom	Joe Hallman	www.agracom.com.au
		,	Brett Stevenson	www.marketcheck.com.au
		AGT Foods Australia	Michael Brittain	www.agtfoods.com/australia
		Associated Grain T/A Agrocorp Processing Australia	Russell Darbey	www.agrocorp.com.au
		Australian Food & Fibre Processing	Peter Webb	www.australianfoodandfibre.com.au
		Australian Fresh Milk Holdings (AFMH)	Jill Smith	www.afmh.com.au
		BFB Pty Ltd	Shane Bird	www.bfb.com.au
		Blairs Produce Company	Sean Blair	crt.com.au/store/blairs-produce-company/
		Boolah Farms Pty Ltd	Stuart Tighe	www.boolah.com.au
		Castlegate James Australasia Pty Ltd	Kevin O'Brien	www.castlegatejames.com.au
		COPRICE	Kirsty Cutter	www.coprice.com.au
		Darwalla Milling Co Pty Ltd	Gary Heidenreich	www.darwalla.com.au
		DDT Holdings	Rajeev Saraff	www.ddtholdings.com.au
		Deckert Group Pty Ltd	Chris Deckert	www.deckerts.com.au
		Esperance Quality Grains Pty Ltd	Neil Wandel	www.esperencequalitygrains.com
		Fletcher International Exports	Joe Masters	www.fletchint.com.au
		Fodder Link Pty Ltd	Cameron Angel	www.fodderlink.com.au
		·	Chris Coates	www.hanlonenterprises.com.au
		Hazeldenes Chicken Farm	Marcus Dingle	www.hazeldenes.com.au
			Brad Bryant	www.igh.net.au
		Inari Australia	Karan Singh	www.inariaustralia.com.au
			Bryan Irwin	www.irwinstockfeeds.com.au
			Nick Poutney	www.itochu.com.au
			Andrew Philpotts	www.rivalea.com.au
			Tyler Caddy	www.jgsh.com.au
		Laucke Flour Mills Pty Ltd	David Harris	www.lgsn.com.au www.laucke.com.au
		Laucke Flour Mills Pty Ltd Lawson Grains	John Marshall	
				www.lawsongrains.com
			Simon Langfield Eric Fisher	www.lpctrading.com.au www.malteurop.com/en/australia
		Malteurop Australia Pty Ltd MC Croker	Jason McPherson	
			Peter MacSmith	www.crokergrain.com.au
		<u> </u>		www.msmmilling.com.au
			Nathan Hunter	www.namoicotton.com.au
		,	Simon Yuncken	www.pentarch.com.au
		Premium Grain Handlers Pty Ltd	John Orr	www.pgh.com.au
		Queensland Cotton Corporation	Ashish Govil	www.qcotton.com.au
		Reid Stockfeeds Pty Ltd	Ian Reid	www.reidstockfeeds.com.au
			Natasha Davies	www.jamesstockfeed.com.au
			Krissy Campbell	www.riverinaoils.com
		SunPork Farms Feed Mills	Mark Young	www.sunporkgroup.com.au
			Stephen Lamond	https://thompsonandredwood.com.au/
			Charlie Brown	www.thriveagri.com
			Trevor Macleod	www.tasstockfeed.com.au
		Unigrain Pty Ltd	Ervin Leong	www.unigrain.com.au
		Viridis Ag	Chris Reeves	www.viridisag.com
		W B Hunter Pty Ltd	Stewart Coombes	www.wbhunter.com.au
		Wilken Grain	Richard Wilken	www.wilkens.com.au
		Woods Grain Pty Ltd	Bruce Woods	www.woodsgroup.com.au
			John Tuskin	www.xldgrain.com.au
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Ag Connex Pty Ltd	Geoff Barker	www.agconnex.com.au
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Agri Om Australia Pty Ltd	Kishore Bulchandani	www.agriom.com.au
Alliance Grains	Luke Walker	www.alliancegrains.com.au
Arya Pulses Australia Pty Ltd	Aravindhan Ravindraraj	www.aryapulses.com.au
A T Waterfield & Son Pty Ltd	Brad Waterfield	linkedin.com/in/brad-waterfield-8767869b
Australian Choice Exports Pty Ltd	James Hunt	www.australianchoiceexports.com.au
Australian Country Choice Feedlots	Brad Taylor	https://www.accbeef.net.au/
Australian Grain Storage	Matt Bailey	www.sunrice.com.au
Australian Growers Direct Pty Ltd	Tyrone Stowers	www.ausgrowersdirect.com.au
Australian Mungbean Company Pty Ltd  A W Vater & Co	Damien White Kim Vater	www.australianmungbean.com.au
Baker Grain	Richard Baker	www.vater.com.au www.bakergrain.com.au
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Defiance Maize Products Pty Ltd	Rodney Walker	www.corson.co.nz
Direct Commodities	Hamish Robertson	www.directcommodities.com.au
DSL Pacific	Katarina Lindkvist	https://www.dslpacific.com/
East Coast Stockfeeds	Stuart Dolden	www.ecsf.com.au
Ellerslie Free Range Farms Pty Ltd	Maria Sue-Tin	www.dahall.com.au
ETG Processing Pty Ltd T/A Wimpak	Brock Tait	www.wimpak.com.au
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Findlays Barellan	Neil Findlay	www.findlay.world/about-us
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Corporate Large ASX Ian Waddell <u>www.asx.com.au/grainfutures</u>	
Australian Grain Technologies Tristan Coram <u>www.agtbreeding.com.au</u>	
Barrett Burston Malting Co.  Dean Ganino  www.bbmalt.com.au	
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	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	https://www.facebook.com/p/Windarra-Grain-Storage-Pty-Ltd-61553819494644/
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International Affiliate	CIS Commodity Inspection Services	Paul Schweitzer	www.cis-inspections.com
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Industry Association	Grain Growers Limited (GGL)	Shona Gawel	www.graingrowers.com.au
	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
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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
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