

26th February 2026

WorkSafe Victoria
c/- Nous Group
Via Engage Victoria portal

Dear Sir/Madam,

RE: Regulatory Impact Statement – Adoption of Workplace Exposure Limits (WEL), Grain Industry Perspective

Dear Sir/Madam,

Executive Brief

The Australian grain industry is a highly trade-exposed, low-margin sector that depends on efficient, safe and scientifically justified regulation to maintain worker safety, productivity and market access. Grain Trade Australia (GTA), as the peak post-farm gate industry association for the grain sector, supports the Victorian Government's objective of reducing workplace harm and protecting workers from hazardous substances.

GTA notes that Safe Work Australia (SWA) and state Work Health and Safety Ministers have recently changed the framework for reviewing and updating workplace exposure limits. This change involved moving from a substance-by-substance, risk-based assessment process to a streamlined methodology designed to improve regulatory efficiency. This change has enabled the review of 700+ hazardous substances and amendment of exposure limits for 278 chemicals in a single process, compared to the previous framework which required approximately \$825,000 and 2.5 years to review and update a single workplace exposure standard.

While GTA understands the efficiency objectives underpinning this new framework, the revised approach materially reduces the level of substance-specific scientific review, feasibility assessment and industry consultation. This is **particularly problematic for critical fumigants such as phosphine and methyl bromide**, which play an irreplaceable role in maintaining grain quality, meeting quarantine requirements of importing countries and securing export market access for the Victorian and Australian grain industry.

The grain industry has a long-standing record of effective management of hazardous fumigants, supported by robust engineering controls, personal protective equipment (PPE), monitoring, training, compliance systems and audit frameworks. GTA is not aware of any evidence of a systemic worker safety failure in the grain industry, nor evidence of significant occupational disease arising from the use of these fumigants over the past 50 years.

GTA has serious concerns regarding the proposed reductions to the Workplace Exposure Limits (WELs) for phosphine and methyl bromide. The Regulatory Impact Statement (RIS) assumes that the case for change has been adequately established, that benefits outweigh costs, and that implementation is feasible. For these fumigants, GTA strongly **disputes these assumptions**.

The scientific basis relied upon by SWA, and thus WorkSafe Victoria, including the use of American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values, is not peer supported for regulatory adoption, does not consider feasibility, and is refuted in several overseas jurisdictions. No fumigant-specific cost-benefit analysis or feasibility assessment has been provided to the grain industry.

The RIS estimates costs to Victorian employers of \$6.3 billion over 10 years, compared to benefits of \$2.9 billion, but does not disaggregate impacts for phosphine and methyl bromide from the 700+ hazardous substances reviewed. For the grain industry, the proposed WELs would cause severe supply

chain disruption, increased compliance costs, reduced productivity, and potential loss of domestic and export market access, with minimal demonstrated additional safety benefit.

GTA urges WorkSafe Victoria not to adopt the revised WELs for phosphine and methyl bromide at this time, and to instead:

- a) support further scientific review,
- b) undertake genuine industry consultation, and
- c) adopt a proportionate, evidence-based approach to worker protection that reflects both safety outcomes and practical implementation realities.

1. Introduction and Context

GTA welcomes the opportunity to comment on the RIS prepared by Nous Group on behalf of the Victorian Government regarding the adoption of the SWA WELs from 1 December 2026.

This submission reflects the collective views of GTA's members and Technical Committees, representing grain traders, storers, handlers, processors and logistics providers operating across Victoria and nationally. It draws on long-standing industry experience, established safety systems, and extensive engagement with Commonwealth and State regulators.

GTA supports national consistency in workplace regulation. However, consistency must be underpinned by robust, **peer-supported science, proportional risk management, and feasible implementation pathways**. These principles are not met in the case of the proposed WEL reductions for phosphine and methyl bromide.

This submission also notes recent changes to the SWA framework for reviewing and updating workplace exposure standards. These framework changes materially affect how WELs have been developed, justified and adopted, and are directly relevant to the assessment of the proposed reductions for phosphine and methyl bromide.

2. About Grain Trade Australia

GTA is the leading post-farm gate industry association in the Australian grain sector, representing more than 295 [member organisations](#) across grain trading, storage, handling, processing and logistics. A Member List is attached.

GTA's core purpose is to facilitate an efficient, transparent and competitive grain trade, domestically and internationally. This is achieved through industry-led frameworks and services including industry codes of practice, assurance systems, technical guidance, training, dispute resolution services, and advocacy on trade, regulatory and market access issues.

GTA works collaboratively with Commonwealth and State governments and regulators to ensure regulatory outcomes protect worker safety while remaining practical, proportionate and economically sustainable across complex grain supply chains.

3. Problem Statement

GTA submits that the RIS does not establish a compelling problem statement for phosphine and methyl bromide that justifies the proposed reductions to the WELs.

The grain industry already manages these fumigants safely and effectively through comprehensive engineering controls, PPE, monitoring, training and compliance systems. The fumigants are applied and grain handled as per label directions. GTA is not aware of any evidence of significant occupational disease in the grain industry associated with their use over the past 50 years.

Existing controls mitigate exposure risks to a level that is already protective of worker health and any nearby general public members. The RIS does not demonstrate that the proposed changes will deliver material additional health benefits relative to current arrangements, nor that the magnitude of the proposed change is proportionate to the disruption and cost imposed on industry.

4. Objectives of Government Intervention

While GTA supports the objective of reducing workplace harm, and the unintended consequences for the general public, the RIS does not demonstrate that there is a market failure requiring intervention, that existing regulatory frameworks are ineffective, or that the proposed changes address a demonstrated safety deficiency.

GTA notes that SWA and state Governments have recently reviewed the framework for workplace exposure standards under the model Work Health and Safety (WHS) laws, on the basis that many Workplace Exposure Standard (WES) values were considered outdated and that the existing review framework was costly and time consuming to apply. Under the previous framework, it took approximately \$825,000 and 2.5 years for government to review and update a single workplace exposure standard.

As part of this review, SWA and Governments considered three options:

- **Option 1:** Maintain the status quo, continuing to update mandatory workplace exposure standards individually on an ad hoc basis.
- **Option 2:** Maintain mandatory workplace exposure standards and update them using a streamlined methodology.
- **Option 3:** Make workplace exposure standards advisory and update them using a streamlined methodology.

The adoption of a streamlined methodology (Option 2) has enabled the review of 700+ hazardous substances and amendment of exposure limits for 278 of those in a single process. While GTA understands the efficiency drivers behind this approach, it raises significant concerns regarding:

- a) the loss of substance-specific risk assessment, feasibility analysis, and
- b) industry-specific impact evaluation

GTA considers these factors are important particularly for substances that play a critical and irreplaceable role in major export supply chains such as the grain industry.

This is especially the case when the scientific advice relied upon by SWA for phosphine WELs is not peer supported and is disputed in several overseas jurisdictions. SWA has relied on the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values (TLVs) as the basis for the reduction in phosphine WELs.

GTA notes:

- a) ACGIH TLVs are **health-based guidelines** that do not consider feasibility or measurement challenges and are not designed for regulatory enforcement across diverse workplaces.
- b) ACGIH established its TLV-TWA of 0.05ppm and the TLV Ceiling of 0.15ppm based on a report of a single human study in which only subjective, reversible symptoms were reported by **Misra et al., 1988** that noted:
 - i. 22 Indian fumigation workers without PPE exposed to phosphine levels ranging from 0.17ppm to 2.11ppm were questioned as part of the research and self-reported respiratory symptoms.
 - ii. The data in that study was insufficient to link measured phosphine exposure levels to any symptoms.
- c) ACGIH based on this report, chose to reduce its phosphine TLV-Time Weighted Average and TLV Ceiling as they stated it *should be sufficient to protect nearly all workers*.
- d) GTA is not aware of any other country that has adopted WELs at the proposed levels. The United States Occupational Safety and Health Administration does not apply ACGIH recommendations.

Proceeding on this basis **risks undermine confidence in the regulatory system** and imposing **unjustified costs on industry**.

National consistency should not come at the expense of scientifically unsound or economically damaging regulation.

5. Options Assessment

GTA does not support Option 2 in the RIS, which proposes adoption of the WEL list as outlined.

The RIS assumes that the justification for change:

- is settled,
- consultation has been adequate, and
- implementation feasibility has been assessed.

Industry **strongly disputes all three assumptions**. Guidance material is premature where the rationale for change remains unresolved, and alternative WEL values were not meaningfully explored.

6. Impact Analysis

For the 700+ hazardous substances evaluated, the RIS estimates costs to Victorian employers of \$6.3 billion over 10 years, compared to benefits of \$2.9 billion. These estimates are aggregated across changes for all the hazardous substances and are not disaggregated for phosphine and methyl bromide. No fumigant-specific health benefit data is provided, and the claimed avoided disease burden is not substantiated for these two fumigants.

Victoria is one of Australia's leading food and fibre exporters, capturing 27% of the national total export value and delivering an impressive \$20.1 billion in exports in 2023–24. Grain was a major contributor to this achievement¹:

| | Value (A\$ million) | | | Volume ('000 tonnes) | | |
|---|---------------------|----------|----------|----------------------|---------|----------|
| | 2022-23 | 2023-24 | % change | 2022-23 | 2023-24 | % change |
|  Grain | \$5,572 | \$ 4,947 | -11% ↓ | 8,669 | 8,793 | 1% ↑ |

For the grain industry, impacts of the revised WELs include significant increases in compliance and monitoring costs, delays in releasing fumigated grain from one to two days to potentially more than two weeks, severe disruption to domestic and export supply chains handling more than 45 million tonnes annually, and reduced productivity in a highly competitive, price-taking global market.

Research is occurring on the impacts of these proposed changes and the ability of the industry to measure fumigant levels and in general, develop management systems to meet the new WELs. That research will not be finalised by 1 December 2026. Hence the impacts on industry, and unfortunately the potential for non-compliance with the new WELs post that date, is unknown.

In the grain industry, non-compliance to WELs is neither practical nor acceptable, particularly when changes are introduced without sufficient tools, management systems, or well-developed solutions to support implementation.

7. Small Business and Competition Impacts

The grain industry includes operators ranging from individual growers and regional storage facilities to multinational trading and processing companies. All businesses will incur significant additional costs. While larger operators may be able to absorb these costs, many small and medium enterprises operating in regional Victoria may not, raising concerns regarding business viability, uneven compliance and competitive distortion.

The Victorian grain supply chain includes numerous small aggregators and container packers and exporters. The impact of these WELs may dramatically influence the shape of the Victorian grain industry post-farmgate supply chain.

¹ Victorian Food and Fibre Export Performance Summary 2023-24

8. Implementation Plan

GTA submits that guidance alone will not enable compliance across the grain industry. Developing compliant systems across the industry at scale before 1 December 2026 is impractical and economically unviable. Effective compliance requires industry understanding of, and confidence in, the scientific justification for change, as well as access to appropriate tools and technologies well in advance of implementation.

9. Evaluation Strategy

While post-implementation evaluation has merit, comprehensive evaluation of costs, benefits and feasibility must occur before regulatory changes proceed. Compliance outcomes are strongest where **industry understands and accepts the justification** for regulatory change.

10. Hazardous Substances

Phosphine and methyl bromide are correctly identified as hazardous substances, and the grain industry recognises and manages the risks when using these fumigants. Industry often exceeds minimum regulatory requirements when using these fumigants to ensure our reputation for providing safe food and management of worker health is maintained. The RIS does not adequately acknowledge the effectiveness of existing controls or the maturity of industry safety systems.

11. Assessment Methodology

The methodology underpinning the proposed WEL reductions reflects a **fundamental shift in the SWA framework** for updating workplace exposure limits.

The streamlined approach adopted by SWA and the state health Ministers prioritises administrative efficiency over substance-specific scientific review, feasibility assessment and industry consultation. It is noted that:

- No fumigant-specific assessment has been adequately conducted or provided to industry for phosphine or methyl bromide, despite their unique use patterns, exposure profiles, monitoring limitations and critical role in grain storage, handling and export supply chains.
- The application of a broad, multi-substance review framework is not appropriate for substances with such significant operational and economic implications.
- GTA submits that efficiency gains for regulators should not be achieved at the expense of proportionate, evidence-based regulation.
- The revised framework does not provide sufficient assurance that the proposed WEL reductions for phosphine and methyl bromide are scientifically justified, practically achievable, or economically sustainable.

The **methodology underpinning the proposed WEL reductions is flawed**. No fumigant-specific risk assessment or feasibility analysis has been adequately conducted or provided to industry, despite the critical role these substances play in grain storage, handling and export supply chains. The ACGIH report used in the assessment is not scientifically valid nor peer reviewed.

12. Stakeholder Engagement

Engagement by SWA and Ministers has been inadequate for phosphine and methyl bromide. Broad references to impacts across hundreds of hazardous substances fail to reflect the specific use patterns, risks, costs and benefits associated with the use of these fumigants in the grain industry.

13. Conclusion

GTA strongly urges WorkSafe Victoria not to adopt the revised WELs for phosphine and methyl bromide at this time. The proposed changes are based on flawed or insufficient scientific evidence, lack adequate industry consultation, and pose severe and unjustified risks to the Victorian and national grain supply chains with minimal demonstrated health benefit.

GTA and its members stand ready to work constructively with WorkSafe Victoria, SWA and other state regulators to review the scientific basis for change, explore proportionate alternatives, and ensure worker safety outcomes are achieved without undermining a critical Victorian and national industry. The key messages in this consultation will be shared with these other jurisdictions.

Thank you for your consideration of this response.



Pat O'Shannassy
Chief Executive Officer



GRAIN TRADE AUSTRALIA

Membership List as of 14 January 2026

| Member Type | Member Level | Account Name | Primary Contact | Website |
|-----------------|------------------------------------|--|--|--|
| Ordinary Member | A1 | Bunge Australia | Stephen Bennett | https://www.bunge.com/Australia |
| | | CBH Group | 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 | ADM Trading Australia | 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 | Matthew Clarke | www.ingham.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 |
| | Wilmar Trading (Australia) Pty Ltd | Matt Albion | www.wilmargavilon.com | |
| | | | 7 | |
| | B3 | Allied Pinnacle | Brett Duczmal | www.alliedmills.com.au |
| | | Brahman Commodities | Michael Aikman | www.brahmancommodities.com.au |
| | | Cofco International Australia | Sarah Pan | www.cofcointernational.com |
| | | Demeter Grains | Barry Mansfield | www.demetergrains.com.au |
| | | K M & W M Kelly & Sons | Matt Kelly | www.kellygrains.com.au |
| | | Quadra Commodities | 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 |
| | | | 8 | |
| | C1 | Agracom | Joe Hallman | www.agracom.com.au |
| | | Agrisk (Market Check) | 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.esperancequalitygrains.com |
| | | Fletcher International Exports | Joe Masters | www.fletchint.com.au |
| | | Fodder Link Pty Ltd | Cameron Angel | www.fodderlink.com.au |
| | | Hanlon Enterprises | Chris Coates | www.hanlonenterprises.com.au |
| | | Hazeldenes Chicken Farm | Marcus Dingle | www.hazeldenes.com.au |
| | | IGH Commodities | Brad Bryant | www.igh.net.au |
| | | Inari Australia | Karan Singh | www.inariaustralia.com.au |
| | | Irwin Stockfeeds | Bryan Irwin | www.irwinstockfeeds.com.au |
| | | Itochu Australia Ltd | Nick Poutney | www.itochu.com.au |
| | | JBS Pork Australia Pty Ltd | Andrew Philpotts | www.rivalea.com.au |
| | | Jerilderie Grain Storage & Handling | Tyler Caddy | www.jgsh.com.au |
| | | Laucke Flour Mills Pty Ltd | David Harris | www.laucke.com.au |
| | | Lawson Grains | John Marshall | www.lawsongrains.com |
| | | LPC Trading Pty Ltd | Simon Langfield | www.lpctrading.com.au |
| | | Malteurop Australia Pty Ltd | Eric Fisher | www.malteurop.com/en/australia |
| | | MC Croker | Jason McPherson | www.crockergrain.com.au |
| | | MSM Milling Pty Ltd | Peter MacSmith | www.msmmilling.com.au |
| | | Namoi Cotton Ltd | Nathan Hunter | www.namoicotton.com.au |
| | | Pentarch Agricultural Pty Ltd | Simon Yuncken | https://pentarchagricultural.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 |
| | | Rex James Stockfeed | Natasha Davies | www.jamesstockfeed.com.au |
| | | Riverina Oils & Bioenergy | Krissy Campbell | www.riverinaoils.com |
| | | SunPork Farms Feed Mills | Mark Young | www.sunporkgroup.com.au |
| | | Thompson & Redwood Pty Ltd | Stephen Lamond | https://thompsonandredwood.com.au/ |
| | | ThriveAgri Pty Ltd | Charlie Brown | www.thriveagri.com |
| | | TSS Grain (Tasmanian Stockfeed Services) | 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 | |

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|----|--|------------------------|---|
| | Woods Grain Pty Ltd | Bruce Woods | www.woodsgroup.com.au |
| | XLD Commodities | John Tuskin | www.xldgrain.com.au |
| | | 48 | |
| C2 | Access Grain Pty Ltd | Wade Humphries | www.accessgrain.com.au |
| | Adams Australia Pty Ltd | Ian Mack | www.adamsaustralia.com.au |
| | Aditi UVG | Harshad Kale | www.aditiuvg.com |
| | Aditya Birla Global Trading (Australia) | Surya Jain | www.abgtrading.com |
| | Advantage Grain Pty Ltd | Chris Nikolaou | www.advantagegrain.com.au |
| | Ag Connex Pty Ltd | Geoff Barker | www.agconnex.com.au |
| | Agmark Commodities | Richard Alcorn | www.agmark.com.au |
| | 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 | Damien White | www.australianmungbean.com.au |
| | A W Vater & Co | Kim Vater | www.vater.com.au |
| | Baker Grain | Richard Baker | www.bakergrain.com.au |
| | Ballarat Grain | Ashley Haase | |
| | Boort Grain Co-Operative | Jon Bucknall | www.boortco-op.com.au |
| | Broun & Co Pty Ltd | Charles Coventry | www.brounandco.com.au |
| | C & S Trading Pty Ltd | Craig Scholz | www.scholzbh.com.au |
| | Carpendale Agri Pty Ltd | Andrew Kluck | www.carpendale.com.au |
| | Carson Stockfeed Pty Ltd | John Carson | 03 6634 7376 |
| | CHA Pacific Pty Ltd | Ryan Yang | http://www.chapacific.com.au/ |
| | Chester Commodities | Richard Black | www.chestercommodities.com.au |
| | C K Tremlett Pty Ltd | Andrew Tremlett | linkedin.com/in/andrew-tremlett-36a06385 |
| | CL Commodities | Robert Lean | www.clcommodities.com.au |
| | Coorow Seeds | Brian Pover | www.coorowseeds.com.au |
| | Cory Johnston (Aust) Pty Ltd | Alicia Dolan | www.coryjohnston.com.au |
| | 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 |
| | 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 Logistics Pty Ltd | Chris Fanning | www.fanmacag.com.au |
| | Feed Central Pty Ltd | Tim Ford | www.feedcentral.com.au |
| | Findlays Barellan | Neil Findlay | www.findlay.world/about-us |
| | Frey Commodities Australia | Campbell May | freycommodities.com |
| | Gold Star International Pty Ltd | Abhishek Kotkar | www.goldstarinternational.com.au |
| | Grainforce Pty Ltd | Stella Larnach | www.grainforce.com |
| | 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.kennetrural.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://www.mahonystransport.com.au |
| | Mallon AgCommodities | Blake Mallon | mallonag.com.au |
| | Mandala Trading | Jay Saraff | www.mandalatrading.com.au |
| | Marina Commodities (Australia) | Palwinder Singh | www.marinacommodities.com |
| | Max Grains Pty Ltd | Jack Fahy | www.maxgrains.com.au |
| | Mckenzie Ag Services | Lachlan Mckenzie | www.mckenzieag.com.au |
| | McNaughts Grain & Fertilizer Pty Ltd | Daniel Mcnaught | www.mcnaughts.com |
| | Melaluka Trading Pty Ltd | Simon Pritchard | www.melalukatradng.com.au |
| | Mellco Pty Ltd | Steve Mellington | www.mellco.com.au |
| | Nandaly Grain Co-Operative | Jon Bucknall | www.nandalyco-op.com.au |
| | Network Grains Pty Ltd | Craig Dennis | www.networkgrains.com.au |
| | Norco | Michael Hampton | https://www.norco.com.au/agrisolutions/grain-team.php |
| | Northbound Trading Pty Ltd T/A WA Lupins | Daniel Marshall | www.walupins.com.au |
| | Origin Grain Pty Ltd | Marcus Currie | www.origingrain.com |
| | Outlook Commodities | Dominic Hogan | https://facebook.com/Outlookcommodities |
| | Pacific Global Sprouts Pty Ltd | Prashant Kewlani | www.pacificglobalsprouts.com |
| | Parkinson Bros | Rohan Parkinson | linkedin.com/in/rohan-parkinson-a76a761b4 |
| | PB Seeds | Peter Blair | www.pbseeds.com.au |
| | Pearson's Grain | Darren Pearson | www.pearsonsgroup.com.au |
| | Peters Commodities | Michael Oxley | www.petcom.com.au |
| | Pinnacle Grains Pty Ltd | Sonal Vij | www.pinnaclegrains.com.au |
| | Plum Grove | Rikki Foss | www.plumgrove.com.au |
| | QS Commodities Pty Ltd | Nick Slipper | www.qscommodities.com |
| | RP Grain Pty Ltd | Gordon Pulham | randpcarriers.com.au/r-p-grains |

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| | | Rural Logic (Aust) Pty Ltd | Michael Wood | www.rurallogic.com.au |
| | | Shannon Bros Bulk Storage Pty Ltd | Clayton Shannon | www.shannonbros.com.au |
| | | Silo Bag Grain (NSW QLD) Pty Ltd | Lesley Kilby | www.silobaggrain.com.au |
| | | Societa Cofica | Dia Ram Sharma | www.societacofica.com.au |
| | | Southern Grain Pty Ltd | Tim Gross | www.southernstockfeeds.com.au |
| | | Southern Grain Storage Pty Ltd | Campbell Brumby | www.southerngrains.com.au |
| | | Spagrimon Australia | Jiger Kotecha | www.spagrimon.com.au |
| | | Standard Commodities Australia Pty Ltd | Elizabeth Bozinoska | www.stancom.com.au |
| | | Sudima Australia | James Garvey | www.sudima.com |
| | | Sun Euro Australia | Tarun Saxena | www.suneuro.com.au |
| | | Tamma Grains Australia Pty Ltd | Kim Packer | www.tammagrains.com.au |
| | | Tasman Agri | Stuart Clarke | https://www.tasmanagri.com.au/ |
| | | TRC International | Yohan Goonetilleke | www.trcglobal.com.my |
| | | Trentham Grazing Pty Ltd T/A Godde's Grain & Fertiliser Pty Ltd | Barry Fisher | www.goddesgrainandfertiliser.com.au |
| | | Ulupna Pastoral Co Pty Ltd | Carly-Lee Perkins | www.ulupna.com.au |
| | | Ulusoy Asia Pacific | Muhammet Genc | www.ulusoyflour.com |
| | | Universal Commodity Management | Tim Dean | www.commoditymanagement.com.au |
| | | Ward McKenzie | Greg Howe | www.mckenziefoods.com.au |
| | | Waterfall Australia | Ian Mallon | ian@waterfallaustralia.com.au |
| | | Watsons Bulk | Joel Watson | www.wbl.net.au |
| | | WHG Oceania Pty Ltd | Gesheng Shen | shen@whgoceania.com.au |
| | | Wycheproof Grain Handling | Bayden Durie | www.wychegrain.com.au |
| | | | 105 | |
| Transport Operator | | Crawfords Freightlines Pty Ltd | Phillip Davis | www.crawfordsfreightlines.com.au |
| | | Gehrke Grains & Transport Pty Ltd | Julian Gehrke | www.gehrke.com.au |
| | | Pacific National (NSW) Pty Ltd | Paul Scurrah | www.pacificnational.com.au |
| | | SEAWAY Intermodal Pty Ltd | Bikash Ram | www.seawayintermodal.com.au |
| | | | 4 | |
| Broker | Medium | Fox Commodities Pty Ltd | Paul Cochrane | www.foxcommodities.com.au |
| | | Grain Brokers Australia | Jeff Winspear | www.grainbrokers.com.au |
| | | Horizon Grain Brokers Pty Ltd | Ash Munro | www.horizongb.com.au |
| | | ICAP Futures (Australia) | Brett Cooper | www.tpicap.com |
| | | Pure Grain Network Pty Ltd | Stuart Tighe | www.puregrain.com.au |
| | | Quest Commodities | Jayne Barker | www.questcommodities.com.au |
| | | Rain Agribusiness | Ian Grellman | www.rainag.com.au |
| | | StoneX Financial | Stefan Meyer | www.intlfcstone.com |
| | | Teague Australia Pty Ltd | Tim Teague | www.teague.com.au |
| | | | 9 | |
| | Sole Operator | A C Grain | Adam Clarke | www.acgrain.com |
| | | Allied Grain Pty Ltd | Angus Wettenhall | www.alliedgrain.com.au |
| | | Cogeser (Australia) Pty Ltd | Robert Luetolf | www.cogeser.com.au |
| | | Farm Tender | Matt Henke | www.farmtender.com.au |
| | | Lotema Pty Ltd | Todd Lees | |
| | | Mallon Commodity Brokering | Ian Mallon | www.mcbrokering.com |
| | | McDonald Pelz Australia | Stuart Richardson | www.mcdonaldpelz.com |
| | | Perkins Commodity Brokers | Craig Perkins | linkedin.com/in/craig-perkins-9a27211a |
| | | Sunrise Commodities | Scott Merson | www.sunrisecommodities.com.au |
| | | Wardi Broking | Sam Ward | www.wardi.com.au |
| | | Woodside Commodities Pty Ltd | Hamish Steele-Park | www.woodcomm.com.au |
| | | | 11 | |
| Corporate | Large | ASX | Ian Waddell | www.asx.com.au/grainfutures |
| | | Australian Grain Technologies | Tristan Coram | www.agtbreeding.com.au |
| | | Barrett Burston Malting Co. | Dean Ganino | www.bbmalt.com.au |
| | | BoortMalt Asia Pacific Pty Ltd | Simon Robertson | www.boortmalt.com |
| | | CIS Control Union Australia | Ashok Rana | cis-controlunion.com |
| | | Commonwealth Bank of Australia | Tom Morgan | www.commbank.com.au |
| | | NSW Ports (Port Kembla Unit Trust) | Joshua Lawrence | www.nswports.com.au |
| | | Regulator Markets | Angus Knight | www.regulatormarkets.com |
| | | Sanitarium Health Food Company | Nathan Bullock | www.sanitarium.com.au |
| | | Symbio Laboratories | Kristian Just | www.symbiolabs.com.au |
| | | | 10 | |
| | Medium | AgriFood Technology | Doreen Fernandez | www.agrifood.com.au |
| | | Amspec Australia | Lee Shilvock | www.amspecgroup.com.au |
| | | Australian Superintendence Company (ASC) | Andrew Parry | www.austsupco.com.au |
| | | Clear Grain Exchange | Nathan Cattle | www.cleargrain.com.au |
| | | Foss Pacific | Rod Gleeson | www.foss.com.au |
| | | HFW Australia | Stephen Thompson | www.hfw.com |
| | | Holding Redlich | Geoff Farnsworth | www.holdingredlich.com |
| | | Intertek | Deborah Millard | www.intertek.com |
| | | Mars Petcare Australia (T/A Mars Birdcare) | Kurt Sosinski | www.mars.com.au |
| | | Oldendorff Carriers Melbourne | Allen Dewhirst | www.oldendorff.com |
| | | PSC Griffith Goodall Insurance Brokers | Mandy Gladman | www.pscggib.com.au |
| | | SBA Law | Jeremy Rosenthal | www.sbalaw.com |
| | | SGS Australia | Trent Charlton-Maughan | www.au.sgs.com |
| | | T-Ports | Nathan Kent | www.tports.com |
| | | | 14 | |
| | Small | Advance Trading Australia | Andrew Woodhouse | www.advance-trading.com.au |
| | | AgriDigital | Emma Weston | www.agridigital.io |
| | | Ag Scientia | Lloyd George | www.agscientia.com.au |
| | | AgVise (WA) Pty Ltd | Shane Sander | www.agvise.com.au |
| | | Aperture Ag Pty Ltd | Alex Campbell | www.apertureag.com.au |
| | | Basis Commodities | Chris Whitwell | www.basiscommodities.com |
| | | Bendigo & Adelaide Bank Ltd Agribusiness Insights Pro | Rod Baker | www.bendigobank.com.au/business/industries/agribusiness/agriculture-insights/ |
| | | BSM Global | Jason Flemming | www.buysellmove.com |
| | | Cloudbreak Grain Marketing | Ed Scamps | www.cloudbreak.com.au |
| | | Cropify | Anna Falkiner | www.cropify.io |

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|-------------------------|--|--|--------------------|---|
| | | Delta Agribusiness | Michael Parry | www.deltaag.com.au |
| | | E P Integrated Commodities | Tracey Lehmann | epicbrokers.biz |
| | | Farmanco Marketing Pty Ltd | Don McTaggart | www.farmanco.com.au |
| | | FARMARCO Australia Pty Ltd | Rob Imray | www.farmarco.com.au |
| | | Finesse Solutions | Malcolm Finlayson | malcolm@finessesolutions.com.au |
| | | Flexi Grain Pty Ltd | Jarrold Tonkin | www.flexigrain.com.au |
| | | Futari Grain Technology Services | Leah Petrie | www.futari.com.au |
| | | Goldstar Commodities | Geoff Webb | www.goldstarcommodities.com.au |
| | | Graintec Scientific | Lucas Anstiss | www.graintec.com.au |
| | | Grainx | Judi Morgan | www.grainx.com.au |
| | | Greenoaks Agriculture Pty Ltd | Richard Perkins | www.greenoaksag.com.au |
| | | Harvestcheck Pty Ltd | Stephen Schumacher | www.harvestcheck.com.au |
| | | Hay Plains Grain Storage Pty Ltd | Ron Harris | www.fellowsbulk.com.au/grainstorage |
| | | IKON Commodities | Ole Houe | www.ikoncommodities.com.au |
| | | Indyn | Rob Martin | www.indyn.net |
| | | 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 |
| | | 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 | https://www.facebook.com/p/Windarra-Grain-Storage-Pty-Ltd-61553819494644/ |
| | | | 42 | |
| International Affiliate | | CIS Commodity Inspection Services | Paul Schweitzer | www.cis-inspections.com |
| | | | 1 | |
| 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 |
| | | | 5 | |
| 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 |
| | | | 4 | |