

11th March 2026:

Department of Agriculture, Fisheries and Forestry
GPO Box 858
Canberra ACT 2601

Email: Via Web

Re: Submission: Cost Recovery Implementation Statement- Plant Export Certification

Dear Sir/Madam,

Grain Trade Australia (GTA) appreciates the opportunity to comment on the Department of Agriculture Fisheries and Forestry (DAFF) Cost Recovery Implementation Statement (CRIS), outlining the transition to new cost recovery arrangements for export regulatory functions from 1 July 2026 and the progression to full cost recovery by 2029–30.

1. Executive Summary

The grain industry is globally competitive, and the efficiency, transparency, and effectiveness of export regulatory services directly influence Australia’s export performance. GTA Members fund the export cost recovery program (ECR) and expect a system that is efficient, accountable, and performance driven.

Key Observations and Recommendations:

1. Efficiency and Cost Recovery

- Full cost recovery must reflect efficient service delivery, incentivise continuous improvement, and remove legacy inefficiencies.
- Historical grain ECR cycles have over-recovered, yet restrictive funding arrangements have constrained transformative initiatives (e.g., ePhyto, registered establishment audit programs, technical market access related travel and engagement).
- GTA seeks assurance that the CRIS aligns with Productivity Commission principles: cost recovery should drive economic efficiency, not merely raise revenue.

2. Scope of ECR

- Proposed expansion of cost recovery activities, including MICOR, has occurred without adequate consultation or transparent justification.
- Industry requires clarity on specific costs and confirmation that the new charges for functions align with established cost recovery principles.

3. Productivity and Reform Initiatives

- Projects such as ePhyto, Grain Storage Assets and Management Standard (GSAMS) and the Grain Assessment Technology Standard (GATS) demonstrate potential for real productivity gains.
- Success requires strategic alignment, early industry involvement, adequate funding, and organisational flexibility.
- Delays in ePhyto highlight systemic challenges and constrain Australia’s international competitiveness.

4. Technical Market Access (TMA) Reform

- The current “single priority” TMA processes create bottlenecks; GTA recommends a structured “pipeline” approach to progress multiple objectives concurrently.

- Greater agility is needed to respond to emerging opportunities and incremental improvements.
- Clear KPIs to reduce average timeframes for market access (currently 9.5 years) would strengthen accountability and performance.

5. Governance and Partnership

- Transition to full cost recovery must be accompanied by formal co-designed governance between senior DAFF leadership and peak exporter bodies.
- Shared decision-making, measurable outcomes, and user-aligned fee structures are essential to ensure that cost recovery drives efficiency, not merely revenue.
- Full cost recovery should be a catalyst for embedding a culture of delivery, accountability, and continuous improvement.

Conclusion:

GTA is committed to working collaboratively with DAFF to ensure Australia's export regulatory framework strengthens national productivity, maintains Australia's reputation as a reliable supplier, and supports the grain sector's global competitiveness. Full cost recovery, if designed and implemented effectively, can be a structural reform that delivers efficiency, accountability, and tangible productivity benefits for both industry and government.

2. About GTA

GTA is a member of the DAFF Grain and Plant Products Export Industry Consultative Committee (GPPEICC). GTA is a national association and the focal point for the commercial grain industry within Australia. 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 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 attached.

As the exporters of grain from Australia, it is **GTA members who pay for the grain ECR program**.

Australia's reputation as a reliable supplier of quality grain is underpinned by DAFF-managed export regulations. GTA and its Members fully support these regulations and work collaboratively with DAFF to achieve shared objectives.

3. Cost Recovery Must Drive Efficiency

The grain industry operates in a globally competitive market and for Australian participants to be successful an efficient, low cost and competitive operating environment is necessary including the provision of government services. Regulatory cost and efficient government services directly affect Australia's export competitiveness.

Accordingly, GTA and its members strongly support a DAFF ECR that:

- Delivers services required by exporters
- Operates within budget
- Reflects the efficient cost of service delivery
- Incentivises continuous improvement
- Encourages modernisation
- Removes legacy inefficiencies; and
- Only includes justifiable costs for services directly incurred for the export of grain to meet the requirements of the Export Control Act.

Unfortunately, this has not been the case with the ECR process over the last 5-year cycle. During this period for the grain sector the grain export cost recovery (ECR) program has exceeded budget and the Department have reported a Cost Recovery Reserve balance of \$6,322,197 at the commencement of the 2026-27 budget period.

Despite the over recovery during this period restrictive and inflexible DAFF funding arrangements hampered grain sector efficiency with cost restrictions applied to transformative grain industry projects (for example the ePhyto, delays to the registered establishment audit program, travel necessary to advancing technical market access in certain export markets). To elaborate further, while the Plant Export Program has been in surplus (where other export agricultural programs were not), it was evident that “blanket bans” (e.g. market access related travel) across DAFF was having a detrimental impact on our sector, despite the ECR program having sufficient funds to pursue necessary engagement and services.

We refer to an expense related comment in the CRIS document, where increasing staffing in 2023/24 returned to “normal levels”. Given the significant strong (and unbudgeted) volume of grain exports in that season (i.e. increased revenue), the increase in staffing levels was not unexpected. We would seek further information on the NET financial impact on the plant export program, and whether the increase in staff levels led to improved efficiency or delivery of services.

It is vitally important to consider the **effectiveness and the application** of the DAFF cost recovery model and the impact it has on the grain industry’s efficiency and productivity.

In prior submissions into the CRIS consultation process, GTA has referred to the Productivity Commission Guidelines on Cost Recovery by Government Agencies. This describes the key principle of government cost recovery mechanisms as:

*“Cost recovery should be implemented for **economic efficiency reasons**, not merely to raise revenue”.*

We bring this principle to your attention and seek verifiable assurances that this CRIS is true and consistent with this important productivity principle.

Based on the consultation process and the published outputs, it appears that the DAFF Sustainable Funding Taskforce has focused predominantly on revenue measures, with insufficient examination of DAFF’s cost base, delivery costs, and operational efficiency.

4. DAFF Expanding the Range of the ECR

GTA is particularly concerned about the proposal in the CRIS to expand the range of activities that the Government now considers appropriate for cost recovery. This came as a surprise to GTA and the grain industry despite DAFF’s multi-year taskforce, consultation with industry and review of the ECR process. There has been:

- a) No meaningful consultation,
- b) No detailed explanation, and
- c) No genuine engagement with industry.

It is also noteworthy that this disappointing lack of consultation / discussion extended to the GPPEICC. At no time was there any indication of the proposed expansion of the ECR scope outlined in the CRIS.

For example, the proposed inclusion of MICOR within the expanded ECR scope is unexpected, as this was not raised in prior industry briefings. This is particularly concerning given that industry already makes a significant contribution to MICOR through the provision of import permit data at no cost to Government.

Furthermore, there remains a lack of transparency regarding the specific costs attributed to the Plant Export Program arising from the activities and functions now proposed to fall within the expanded scope. There is also no clear explanation of how these activities were assessed against established ECR principles and guidelines.

This lack of clarity and process is regrettable. It materially informs GTA's assessment of the CRIS and contributes to the broader scepticism across the agricultural sector regarding the adequacy, integrity, and **sincerity of the Government's consultation** process in relation to this CRIS.

5. Productivity Through Strategic Reform - ePhyto – an example

The implementation of electronic phytosanitary certification (ePhyto) through the International Plant Protection Convention (IPPC) hub provides a clear example of reform with genuine productivity potential.

Where fully implemented and integrated:

- Paper-based processes are reduced
- Administrative duplication is removed
- Transaction times are shortened
- Error rates decline as manual interventions decrease

Such outcomes should deliver productivity gains for both industry and Government.

However, realising the full efficiency benefit of ePhyto requires strategic alignment, **consistent prioritisation, adequate funding** and joint implementation planning. Reform of this nature is most effective when industry expertise is incorporated early and continuously throughout the process.

GTA promotes that ePhyto demonstrates that productivity-enhancing reform is possible – but it must be treated, funded and resourced as a **structural efficiency initiative**, not merely a technology deployment.

The delivery of the DAFF ePhyto project for the grain sector is now **several years behind schedule** and has been characterised by multiple false starts. This has resulted in avoidable additional costs and highlights broader organisational challenges within DAFF in designing and implementing timely, cost-effective reform.

It is particularly concerning that many other countries – including a number of developing economies – have successfully implemented ePhyto systems, while Australia continues to lag. This delay represents a tangible productivity constraint on Australian industry, undermining its ability to compete efficiently in highly competitive international markets.

6. GSAMS / GATS

The Grain Storage Assets and Management Standard (GSAMS) and the Grain Assessment Technology Standard (GATS) projects illustrate how Government and industry can jointly pursue structural efficiency, by:

- Standardising systems and expectations,
- Aligning compliance approaches,
- Reducing duplication, and
- Increasing clarity of regulatory requirements.

These projects have the potential to reduce administrative burden while maintaining regulatory integrity and improving productivity. However, in relation to GSAMS its full efficiency cannot be realised due to the inflexible nature of the DAFF ECR model.

Under the GSAMS model, elements of the Registered Establishment and Authorised Officer functions would effectively be undertaken by deemed industry delegates, representing a partial outsourcing of activities that are currently delivered directly by DAFF. As a result, GSAMS participants would rely less on DAFF's direct regulatory services, with those activities instead funded and managed by industry.

In this context, it is reasonable for prospective GSAMS participants to expect a commensurate reduction in DAFF ECR fees to reflect their lower utilisation of departmental services. However, following internal consideration, DAFF advised that fee adjustments would not be possible, notwithstanding the reduced demand on its regulatory resources.

For DAFF's cost recovery framework to genuinely drive efficiency and reform, **greater flexibility in the structure of fees and charges** is required. A more direct user-pays approach – rather than a

predominantly collective fee model — would better align costs with service usage and support productivity gains for both DAFF and industry.

This type of reform reflects a broader principle - *efficiency gains are maximised when Government and industry design solutions together.*

GSAMS and GATS are not simply compliance projects — they are **productivity projects**. That distinction is important in the context of cost recovery and the need to improve productivity across the economy.

7. Government / Industry Transformative Change

Large-scale administrative reform is inherently complex within public sector structures. Budget cycles, governance layers and procurement frameworks can limit the pace and flexibility of change.

Industry, by contrast, operates within commercial disciplines that demand rapid and continuous adjustment of cost and investment strategy to ensure optimum performance.

These disciplines are directly relevant to regulatory reform. If Government attempts to pursue transformation independently, there is a risk of:

- Prolonged implementation timeframes,
- Suboptimal system design,
- Escalating costs, and
- Reduced productivity outcomes.

A strategic partnership approach between industry and government mitigates these risks.

GTA is of the view that a fundamental shift is required in the approach taken by the DAFF Market Coordination Strategy — the area responsible for technical market access (TMA). Specifically, the current model should move away from an apparent focus on a **single “top priority”** and instead adopt a structured **“pipeline” approach** to progressing multiple market access objectives concurrently.

It is a persistent frustration for industry that DAFF’s technical market access work is often communicated as being limited to one priority at a time. If this is not the case, it is not clearly conveyed. A single-priority model inevitably produces binary outcomes — progress on one issue while all others remain stalled. A pipeline approach, by contrast, would allow multiple market access requests to be progressed at different stages simultaneously.

Greater agility is also required. DAFF should be positioned to respond to emerging opportunities, “quick wins” (particularly incremental TMA improvements), and shifting political or market conditions. Market access negotiations can experience extended **periods of inactivity** while awaiting responses from counterpart regulators. During these intervals, there should be capacity to advance other priorities already in the pipeline. By definition, this requires more than one active priority.

GTA acknowledges and commends DAFF’s recent engagement with China’s General Administration of Customs of the People’s Republic of China (GACC) regarding canola market access. Improving access for Australian canola into China represents a significant opportunity for the grain industry and the broader economy. In this instance, DAFF responded constructively to signals from GACC and worked collaboratively with industry to develop a viable pathway to re-establish export trade flows. This demonstrates the level of responsiveness and adaptability that should become standard practice, rather than defaulting to a process that relies solely on industry nominating a single priority — which can inadvertently limit flexibility.

Finally, GTA considers that DAFF should establish a clear objective or KPI to reduce the average timeframe required to achieve full technical market access for a market/product combination (currently cited as 9.5 years). While recognising that outcomes depend on engagement with counterpart governments and their respective constraints, reducing timeframes should nonetheless be an explicit performance objective. Setting such a benchmark would help shape a stronger delivery culture within DAFF and would represent a practical productivity reform sought across the agricultural sector — with significant benefits for regional economies.

8. Strategic Efficiency Framework for Full Cost Recovery

As Australia transitions to full cost recovery, the framework must change to one where government is accountable to industry and works in tandem to improve government services and efficiency. Full cost recovery should represent the funding of an efficient regulatory system — not the funding of historical cost structures.

GTA requests DAFF adopt a **collaborative approach to government efficiency and reform**. This may be best served through a governance mechanism between senior departmental leadership and peak exporter bodies to identify and prioritise efficiency opportunities and to steward these through to implementation.

GTA would consider progressing a collaborative approach and regulatory efficiency if this is a genuine partnership approach where industry has joint decision making in strategic investment in efficiency opportunities.

In some ways this aligns with the proposal by DAFF to introduce a new and ongoing ECR fee – the ‘*regulatory efficiency program*’ deemed necessary to improve regulatory efficiencies and reduce cost of export arrangements that benefit the sector. However, if industry is now being asked to fund efficiency targeting department initiatives governance arrangements must be agreed. Based on the failure of previous government projects (e.g.: Busting Congestion) GTA **cannot support this initiative** without joint decision-making capabilities.

9. Conclusion

GTA supports cost recovery when it is implemented for economic efficiency reasons, not merely to raise revenue.

The transition to full cost recovery should not be merely a funding adjustment – it provides an opportunity for **structural reform of Australia’s export regulatory architecture**. As such, it must be anchored in demonstrable efficiency, transparency, and genuine partnership with industry.

Full cost recovery must fund an efficient regulatory system – not perpetuate historical cost structures, internal inefficiencies, or inflexible funding models. Revenue sufficiency alone cannot be the measure of success.

GTA remains concerned that the current CRIS does not sufficiently demonstrate:

- Rigorous scrutiny of DAFF’s underlying cost base
- Transparent assessment of expanded cost recovery scope against established principles
- Alignment between service usage and fees charged
- A structural commitment to measurable productivity improvement

At a time when industry is being asked to fund the system in full, it is reasonable to expect clear evidence that the system is efficient, accountable and performance driven.

The next phase of reform must therefore move beyond consultation toward **structured co-design**. A formal governance mechanism between senior departmental leadership and peak exporter bodies – with joint oversight of regulatory efficiency initiatives – would provide the confidence required for industry to support new investment in reform. Without shared decision-making and measurable outcomes, additional “efficiency” levies risk being viewed as revenue measures rather than productivity initiatives.

Australia’s grain industry has demonstrated its willingness to partner constructively with DAFF to maintain and enhance our export reputation. Initiatives such as GSAMS/GATS development, and responsive engagement on market access matters illustrate what can be achieved when government and industry work strategically together.

The transition to full cost recovery should be treated as a catalyst to embed structural efficiency and performance across the regulatory framework. Key elements of this approach include:

- A pipeline approach to market access
- Flexible, user-aligned fee structures
- Clear KPIs around timeliness and service delivery
- A culture of delivery and accountability

If designed and implemented effectively, full cost recovery has the potential to strengthen Australia’s export competitiveness and regional productivity. Conversely, if the reform is not grounded in efficiency and shared accountability, there is a significant risk that cost escalation without corresponding performance improvement.

GTA stands ready to work in genuine partnership to ensure Australia's export regulatory framework enhances – rather than constrains – national economic productivity and international competitiveness.

Thank you for the opportunity to provide this submission.

Please do not hesitate to contact GTA should you wish to discuss these matters further.

Yours faithfully,

A handwritten signature in black ink, appearing to read "P O Shannassy".

Pat O'Shannassy
CEO, Grain Trade Australia



GRAIN TRADE AUSTRALIA

Membership List as of 19 Augut 2025

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		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 Emerald Australia	David Johnson	www ldc.com	
			2		
	B1	Arrow Commodities	Dominic Vanzella	www.arrowcom.com.au	
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		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.ingham.com.au	
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		Riverina (Australia)	Jon Mulally	www.riverina.com.au	
	Wilmar Trading (Australia) Pty Ltd	Matt Albion	www.wilmargavilon.com		
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	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	
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	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	Kristy 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		
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Inari Australia		Karan Singh	www.inariaustralia.com.au		
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Itochu Australia Ltd		Nick Poutney	www.itochu.com.au		
JBS Pork Australia Pty Ltd		Andrew Philpotts	www.rivalea.com.au		
Jerilderie Grain Storage & Handling		David Barlow	www.jgsh.com.au		
Laucke Flour Mills Pty Ltd		Jacques Holl	www.laucke.com.au		
Lawson Grains		John Marshall	www.lawsongrains.com		
LPC Trading Pty Ltd		Simon Langfield	www.lptrading.com.au		
Malteurop Australia Pty Ltd		Eric Fisher	www.malteurop.com/en/australia		
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MSM Milling Pty Ltd		Peter MacSmith	www.msmmilling.com.au		
Namoi Cotton Ltd		Nathan Hunter	www.namoicotton.com.au		
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Reid Stockfeeds Pty Ltd		Ian Reid	www.reidstockfeeds.com.au		
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	Adams Australia Pty Ltd	Ian Mack	www.adamsaustralia.com.au		
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	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		

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	Australian Choice Exports Pty Ltd	James Hunt	www.australianchoiceexports.com.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
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	Baker Grain	Richard Baker	www.bakergrain.com.au
	Boort Grain Co-Operative	Jon Bucknall	www.boortco-op.com.au
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	C & S Trading Pty Ltd	Craig Scholz	www.scholzbh.com.au
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	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	Shayne Clark	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
	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
	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
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	Kangaroo Island Pure Grain	Emma Tonkin	www.kipuregrain.com
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	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.melalukatrading.com.au
	Mellco Pty Ltd	Steve Mellington	www.mellco.com.au
	Nandaly Grain Co-Operative	Jon Bucknall	www.nandalycop.com.au
	Network Grains Pty Ltd	Craig Dennis	www.networkgrains.com.au
	Norco		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
	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
	Spagicon Australia	Jiger Kotecha	www.spagicon.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
	Sunny Trading Group	Tony Nguyen	https://sunnytradegroup.com.au/
	Tamma Grains Australia Pty Ltd	Kim Packer	www.tammagrains.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@tqai.cn
	Wirrinourt Transport & Trading	Karl Hendy	www.wirrinourttransport.com.au
	Wycheproof Grain Handling	Bayden Durie	www.wychegrain.com.au
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Transport Operator	Crawfords Freightlines Pty Ltd	Phillip Davis	www.crawfordsfreightlines.com.au
	Gehrke Grains & Transport Pty Ltd	Julian Gehrke	www.gehrke.com.au
	Hamilton Contracting (NSW) Pty Ltd	Jodie Hamilton	www.hamiltoncontracting.com.au
	Pacific National (NSW) Pty Ltd	Paul Scurrah	www.pacificnational.com.au
	SEAWAY Intermodal Pty Ltd	Bikash Ram	www.seawayintermodal.com.au
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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	
		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	
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	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	www.lotema.com.au	
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			
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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)	Campbell Mason	www.nswports.com.au	
		Regulator Markets	Angus Knight		
		Sanitarium Health Food Company	Nathan Bullock	www.sanitarium.com.au	
		Symbio Laboratories	Kristian Just	www.symbiolabs.com.au	
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		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		Karl Hansal	www.foss.com.au	
	HFW Australia		Stephen Thompson	www.hfw.com	
	Holding Redlich		Geoff Farnsworth	www.holdingredlich.com	
	Intertek		Debbrah 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.pscgib.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		
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	Small	Advance Trading Australasia	Andrew Woodhouse	www.advance-trading.com.au	
		AEGIC	Courtney Draper	www.aegic.org.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	
		BSM Global	Jason Flemming	www.buysellmove.com	
		Cloudbreak Grain Marketing	Ed Scamps	www.cloudbreak.com.au	
		Cropify	Anna Falkiner	www.cropify.io	
		Delta Agribusiness	Michael Parry	www.deltaag.com.au	
		E P Integrated Commodities	Tracey Lehmann	epicbrokers.biz	
		Farmanco Marketing Pty Ltd	Donald 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	Jarrod 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	https://www.linkedin.com/in/richard-perkins-39090a3b/		
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		
Mirfak P/L		Josh Whelan	www.mirfak.com.au		
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				
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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)	Duncan Rowland	www.sfmca.com.au		

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Merchant Association		Grain Industry Association of SA (GIASA)		Marie Cunningham
		Grain Industry Association of VIC (GIIV)		Colin Peace
		Grain NSW		Joanne Ware
		Queensland Agricultural Merchants (QAM)		Rob Imray
			4	

www.giasa.org.au

www.giiv.com.au

www.grainns.com.au

www.qam.org.au