

Date: 8th May 2026

Ms Jemma Martin
Assistant Secretary
Plant Export Branch
Department of Agriculture, Fisheries and Forestry

Via Email: Jemma.Martin@aff.gov.au

RE: GTA Submission – Review of the Accredited Grain Surveyor Assurance (AGSA) Scheme

Dear Jemma,

Grain Trade Australia (GTA) welcomes the opportunity to provide input into the review of the Accredited Grain Surveyor Assurance (AGSA) Scheme.

GTA has around 280 organisations as members. Their businesses range from regional family enterprises to large national and international trading, storage and handling companies involved in grain trading, storage, marketing advisory services, processing grain for human consumption and stockfeed milling. GTA Members are the exporters of Australia's grain, substantial employers from the farm gate through to end-point consumption, particularly in rural and regional Australia. A full list of GTA Members is attached and available at www.graintrade.org.au

GTA members have a strong interest in ensuring the AGSA framework continues to uphold Australia's internationally recognised biosecurity and export standards, while also supporting efficient, predictable, and commercially viable export operations.

GTA notes that the review is intended to assess the efficiency, effectiveness, and quality of the AGSA Scheme and supports an evidence-based approach informed by operational experience, user feedback, and performance data. As an underlying principle, and consistent with the Government's broader agenda to reduce red-tape and improve productivity, GTA believes regulatory arrangements and process should be regularly reviewed and be considered commensurate with risk.

GTA supports the use of accredited marine surveyors under the AGSA framework and, in principle, supports the continuation and appropriate expansion of independent assessment, provided competency, governance, and safety standards are maintained.

From an industry perspective, timely and predictable inspection outcomes are critical to supply chain efficiency. Delays in vessel clearance directly impact shipping schedules, port operations, and Australia's ability to meet customer commitments in global markets.

1. Operational Efficiency

GTA considers there is scope to modernise elements of the framework and to rationalise the interface with the Department of Agriculture Fisheries and Forestry (DAFF) bulk vessel inspection while maintaining inspection integrity. Consideration should be given to any initiative that increases operational efficiency and vessel performance. GTA members have suggested allowing night-time surveys under appropriate safety and lighting conditions and expanding the use of safe anchorage inspections where operationally feasible as concepts worth considering. These measures would encourage improved vessel preparation, reduce berth delays, and enhance overall system efficiency.

GTA notes that both accredited marine surveyors and DAFF Authorised Officers undertake inspection activities relating to vessel condition and suitability to load grain. While these roles serve different regulatory or commercial purposes, there is a significant degree of overlap in practical inspection activities.

Operational constraints associated with DAFF inspection processes, including requirements for multiple Authorised Officers and limitations on attending vessels at anchorage in certain locations or conditions, can further contribute to delays. GTA encourages consideration of a more integrated and risk-based approach to inspections, including improved coordination between inspection functions and greater recognition of accredited marine surveyor outcomes where appropriate.

2. Managing Conflicts of Interests

In relation to conflicts of interest, GTA supports a risk-based approach focused on declaration, transparency, and effective management rather than blanket prohibition. Industry experience indicates that efficient and compliant operations rely on service providers capable of operating consistently across multiple ports while meeting high safety and compliance standards. GTA supports clear disclosure requirements, strong recordkeeping, and **robust** Australasian Institute of Marine Surveyors (AIMS) and **DAFF oversight and audit processes** but does not support restrictions that limit operational flexibility where risks can be effectively managed via good governance arrangements.

GTA notes that many industry participants already operate under established governance and assurance frameworks, including conflict of interest policies, contractor management systems, and internal and external audit processes. Additional AGSA requirements should be carefully considered to avoid duplication and unnecessary operational complexity without delivering improved assurance outcomes.

GTA also emphasises the importance of meaningful and timely industry engagement in the development and review of frameworks such as AGSA. Given the operational complexity of 'just in time' bulk grain exports, early and ongoing consultation with industry participants is critical to ensuring that policy settings are practical, implementable, and aligned with real-world conditions and the associated contractual and financial risk.

3. Stakeholder Consultation

GTA acknowledges that consultation is now occurring between AIMS, DAFF and industry. However, we remain concerned that engagement with industry appears to have occurred relatively late in the development process. A more collegiate and collaborative approach between DAFF, AIMS, and industry would support better policy outcomes, improved implementation, and greater confidence in the framework. GTA encourages the establishment of joint structured engagement mechanisms, including early consultation (especially with the parties in the supply chain that wear the financial risk exposure from vessel delays) and ongoing industry forums.

4. Recommendations

To support the review process, GTA provides the following key recommendations mapped to the AGSA Standard (June 2025 V3.1):

- a) Clarify and streamline roles between Marine Surveyors and Authorised Officers **to reduce duplication** and establish clear escalation pathways (Section 3).
- b) Explore a risk-based model recognising accredited Marine Surveyor findings within DAFF approval processes where appropriate (Sections 3 and 5).
- c) Enable night-time surveys and expand anchorage inspection capability under defined safety and quality conditions (Sections 6 and 8).
- d) Reinforce that survey duration guidance is indicative and risk-based rather than prescriptive (Section 7).
- e) Improve clarity and consistency through more objective definitions and expanded photographic guidance for contamination and condition standards (Section 8).
- f) Review accreditation and training requirements to support workforce sustainability and avoid bottlenecks (Section 4).

- g) Clarify digital recordkeeping requirements, including data standards and access (Section 10).
- h) Adopt a conflict-of-interest framework based on declaration, transparency, and audit rather than prohibition.
- i) Conduct audits across both marine surveyors and DAFF authorised officers.
- j) Establish formal, ongoing industry engagement mechanisms to support policy development and implementation.

5. Conclusion

As noted, GTA supports the ongoing development of the AGSA scheme and its vital role in safeguarding the integrity of Australia's grain export system. With both accredited marine surveyors and DAFF Authorised Officers conducting vessel inspections for condition and suitability for grain loading, there is a clear overlap in practical inspection activities. GTA therefore advocates for a pragmatic, risk-based approach—one that upholds rigorous biosecurity standards while enhancing operational efficiency, minimising duplication, and fostering stronger collaboration between government and industry.

GTA looks forward to continued engagement with DAFF as the review progresses.

Please do not hesitate to contact GTA at any time.

Yours sincerely,



Pat O'Shannassy
CEO, Grain Trade Australia