

25<sup>th</sup> May 2026

The Hon Julie Collins MP  
Minister for Agriculture, Fisheries and Forestry  
Parliament House  
Canberra ACT 2600

**Re: Workplace Exposure Limit for Phosphine – Implications for Australia’s Grain Industry and Regional Economy**

Dear Minister,

We write regarding the proposed implementation of the revised Workplace Exposure Limits (WELs) for phosphine scheduled to commence on 1 December 2026.

This issue is one of the matters Grain Trade Australia (GTA) wishes to discuss with you at the meeting arranged for 27 May 2026. However, given the potentially significant impacts the proposed changes may have on the grain industry, regional communities and Australia’s grain export supply chain, we considered it important to raise these concerns separately and directly through this correspondence.

We acknowledge that responsibility for WELs primarily sits within workplace health and safety portfolios. On that basis, on behalf of the grain industry, GTA has provided correspondence to relevant Health and Workplace Relations Ministers seeking deferral of the proposed phosphine WEL implementation. However, given the potentially significant consequences for Australia’s grain industry, agricultural supply chains, export performance, market access and regional communities, we are seeking the support of Agriculture Ministers to ensure these broader agricultural and economic impacts are fully considered before implementation proceeds.

Therefore, the objective of this additional correspondence is to **seek your support for an immediate deferral of implementation of the phosphine WELs** to allow further scientific review, validation of monitoring capability, and assessment of operational feasibility across the Australian grain supply chain.

The grain industry supports strong, evidence-based worker health and safety protections and remains fully committed to safe fumigation practices. This has been demonstrated by the industry’s past performance in that regard, using various management systems to ensure worker health is not impacted by fumigation practices. However, the proposed phosphine WELs of 0.05 ppm Time-Weighted-Average (TWA) and 0.15 ppm Peak do not currently appear capable of practical implementation within real-world grain operations.

Importantly, while the industry remains strongly focussed on worker health outcomes, there does not appear to be a clearly demonstrated material health benefit arising from the proposed reduction from the current standards of 0.3 ppm TWA) and 1 ppm Short Term Exposure Limit (STEL). At the same time, the operational, commercial and regional consequences of implementation are likely to be profound.

If implemented in their current form, the proposed WELs risk creating widespread non-compliance, regulatory uncertainty, disruption to grain storage and export logistics, and significant economic impacts across rural and regional Australia.

There are three core concerns:

**1. No demonstrated proportional health benefit**

- There has been no clearly articulated or quantified burden of disease identified under the current phosphine exposure settings, nor transparent explanation of the incremental health benefit for workers expected from the proposed reduction.

## **2. The proposed standard is not currently measurable or verifiable**

- Compliance at 0.05 ppm—and particularly verification of a 0.15 ppm instantaneous Peak—cannot currently be reliably achieved using available monitoring methods in practical grain industry environments. A standard that cannot be consistently measured cannot be effectively enforced.

## **3. The proposed standard has not been validated for operational feasibility**

- The revised framework for reviewing over 700 compounds and implementing new WELs for compounds such as phosphine has resulted in limits being established without prior testing within key agricultural industries and supply chains. Industry is therefore being asked to comply with a standard for which there is currently no demonstrated practical pathway to implementation.

This creates a significant risk of systemic non-compliance, not through unwillingness to comply, but because the standard itself is not presently operationally achievable.

The broader implications for Australian agriculture are substantial and include:

- Disruption to grain storage, handling and export supply chains;
- Increased costs throughout the grain marketing system;
- Reduced competitiveness of Australian grain exports;
- Commercial impacts on growers, bulk handlers, exporters and regional communities;
- Misalignment with existing APVMA fumigation label requirements, including the current 0.3 ppm clearance standard;
- Increased regulatory uncertainty across a nationally significant export industry.

Phosphine is an essential fumigant underpinning Australia's grain protection system and export capability. Any regulatory framework affecting its use must be scientifically robust, measurable, enforceable and operationally achievable.

The grain industry is actively undertaking further research and technical work, including investment programs supported through the Grains Research and Development Corporation. However, this work is not expected to be completed until approximately 2030. Proceeding with implementation ahead of this evidence risks embedding a regulatory standard that cannot function effectively in practice.

We therefore respectfully request your support for:

- Deferral of implementation of the phosphine WELs;
- A targeted, substance-specific scientific review of phosphine;
- Greater transparency regarding the scientific basis for the revised limits;
- Validation of monitoring capability and operational feasibility prior to enforcement;
- Alignment between Safe Work Australia requirements and APVMA regulatory settings.

This issue extends beyond workplace compliance alone. It has potentially major implications for Australia's grain supply chain, export performance and regional economies.

Grain Trade Australia's Chair and CEO will be in Canberra on 27<sup>th</sup> May 2026 and look forward to discuss this matter further, including the potential implications for the Australian grain export sector and regional communities.

We remain committed to working constructively with governments, regulators, workers and technical experts to achieve safe, practical and enforceable outcomes.

Yours sincerely,



**Pat O'Shannassy**  
CEO, Grain Trade Australia



**Gerard McMullen**  
Chair, National Working Party on Grain Protection



**Shona Gawel**  
CEO, Grain Growers

