

15 September 2026

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: lclfconsultation@infrastructure.gov.au

Submission from Grain Trade Australia

RE: Australian Government consultation on LCLF demand measure

1. About Grain Trade Australia

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](#) (attached) 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 280 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 2025-26, the industry is valued at an estimated \$28.4 billion, including \$22.3 billion in exports, representing more than 25 per cent of Australia's total agricultural production.

Grain production is forecast at 73.0 million tonnes in 2025-26, including 7.7 million tonnes of canola production valued at \$ 5.8 billion. 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 and diversifying sources of fuel.

3. Securing Australia's Cleaner Fuels Industry: Consultation paper on a demand mechanism

GTA welcomes the opportunity to comment on the Australian Government's proposed demand mechanism for low carbon liquid fuels (LCLF).

We broadly supports the Government's direction and the development of a commercially viable Australian LCLF industry. A domestic industry has the potential to strengthen fuel security, attract investment, support regional development and create additional demand and value-adding opportunities for Australian grain and oilseeds.

GTA has not responded to the consultation paper's individual technical questions, many of which sit outside GTA's direct remit. Instead, this submission highlights several principles relevant to the operation of the Australian grain market and supply chain.

3.1 Australian canola is produced in response to market signals

Australian canola is a globally traded commodity with multiple uses, including food, animal feed (including protein meals) and fuel production. It is not generally grown for a predetermined end market use.

Growers make planting decisions based on expected returns, seasonal and agronomic conditions, crop rotations and the **relative margin per hectare compared with alternative crops**. Once produced, canola is purchased, stored, accumulated and traded through an established supply chain. It ultimately moves to the domestic or international market offering the most competitive return.

The availability of canola for LCLF production will therefore depend principally on the price offered by LCLF producers relative to competing markets. Government modelling should recognise this commercial reality and should not assume that a fixed proportion of Australian canola production is automatically available as fuel feedstock.

The supply chain ensures optionality and flexibility for canola's ultimate demand pathway. This optionality adds value to producer returns and ensures demand is not captive, rather consumers and end-users must compete, thereby driving optimal returns and efficiency.

3.2 Policy should support production without distorting grain markets

GTA supports policies that provide the confidence required to invest in Australian LCLF production, processing and refining capacity.

Any demand mechanism should preserve open and competitive grain markets. New LCLF producers should purchase grain and oilseeds through the existing market on the same commercial basis as other domestic and export customers. Government support should focus on developing LCLF production and refining capacity rather than directing feedstock supply or creating preferential access to grain.

Australia already has sophisticated grain accumulation, storage, certification and transport systems. These existing supply chains should be utilised rather than duplicated through government-supported, LCLF-specific feedstock hubs. To do otherwise will also undermine the efficiency of existing assets and infrastructure.

3.3 A practical pathway to domestic value-adding

GTA supports the long-term objective of Australian-grown feedstocks being processed and converted into LCLF within Australia. This would retain more value domestically, support regional investment and strengthen Australia's fuel-production capability.

However, a flexible and staged approach may be necessary while the Australian industry develops. In the initial stages, Australian-grown canola may need to be processed or refined offshore where established facilities and commercial capacity already exist.

GTA supports a practical, market-based and technology-neutral framework that encourages investment in Australian LCLF production while maintaining efficient grain trade and allowing commercial markets to determine where Australian grain and oilseeds are used.

4. Conclusion

GTA supports the development of a commercially viable Australian LCLF industry Cleaner Fuels Program. 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,

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

Pat O'Shannassy
CEO, Grain Trade Australia

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	A3	Cargill Australia	Zsolt Kocza	www.cargill.com.au
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		George Weston Foods	Michael Schmidt	www.gwf.com.au
		Manildra Group	Peter Sloan	www.manildra.com.au
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		J K International Pty Ltd	Sandeep Mohan	www.jki.com.au
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			6	
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			8	
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		Ulusoy Asia Pacific	Muhammet Genc	www.ulusoyflour.com
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			103	
		Crawfords Freightlines Pty Ltd	Phillip Davis	www.crawfordsfreightlines.com.au
		Gehrke Grains & Transport Pty Ltd	Julian Gehrke	www.gehrke.com.au
Broker	Medium	Pacific National (NSW) Pty Ltd	Ivan McLeod	www.pacificnational.com.au
		SEAWAY Intermodal Pty Ltd	Bikash Ram	www.seawayintermodal.com.au
			4	
		Fox Commodities Pty Ltd	Paul Cochrane	www.foxcommodities.com.au
		Grain Brokers Australia	Jeff Winspear	www.grainbrokers.com.au
	Sole Operator	Horizon Grain Brokers Pty Ltd	Ash Munro	www.horizongb.com.au
		ICAP Futures (Australia)	Brett Cooper	www.tpicap.com
		Key Agri Services Pty Ltd	Ben Shannon	https://www.keyagri.com.au/
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		A C Grain	Adam Clarke	www.acgrain.com
		Allied Grain Pty Ltd	Angus Wettenhall	www.alliedgrain.com.au
	Medium	Cogeser (Australia) Pty Ltd	Robert Luetolf	www.cogeser.com.au
		Farm Tender	Matt Henke	www.farmtender.com.au
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			11	
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		NSW Ports (Port Kembla Unit Trust)	Joshua Lawrence	www.nswports.com.au
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		Australian Superintendence Company (ASC)	Andrew Mynn	https://www.asc.co/
		Clear Grain Exchange	Nathan Cattle	www.cleargrain.com.au
		Foss Pacific	Henry Dong	www.foss.com.au
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		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
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			14	
	Small	Advance Trading Australia	Andrew Woodhouse	www.advance-trading.com.au
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		Overseas Merchandise Inspection Co Ltd	Masayuki Akiya	www.omicnet.com
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		Planfarm Marketing Pty Ltd	Jerome Critch	www.planfarm.com.au
		Priag Marketing Pty Limited	Kevin Schwager	www.priag.com.au
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		Saputo Dairy Australia	Ashley Denishensky	www.saputo.com
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Industry Association			1	
		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)	Duncan Bremner	www.grainproducers.com.au
		NSW Farmers Association	Lizzie Sarks	www.nswfarmers.org.au
		Stock Feed Manufacturers' Council of Australia (SFMCA)	Ellen Buckle	www.sfmca.com.au
Merchant Association			5	
		Grain Industry Association of SA (GIASA)	Marie Cunningham	www.giasa.org.au
		Grain Industry Association of VIC (GIIV)	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
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