

16 June 2017

The Confidentiality Manager
International Trade Section
Australian Bureau of Statistics
PO Box 10
BELCONNEN ACT 2616

Email: international.trade@abs.gov.au

Dear Sir/Madam

I write regarding the confidentiality on the AHECC codes relating to Barley including barley for malting and for feed and to request that this confidentiality requirement be lifted.

About GTA

Grain Trade Australia (GTA) is the focal point for the commercial grains industry within Australia. It facilitates trade and works to provide an efficient, equitable and open trading environment by providing leadership, advocacy and commercial services to the Australian grain value chain. GTA members are responsible for over 95% of all grain storage and freight movements made each year in Australia. Over 95% of the grain contracts executed in Australia each year refer to GTA grain standards and/or trade rules. GTA members are drawn from all sectors of the grain value chain from production to domestic end users and exporters. GTA members are involved in grain trading activities, grain storage, human and stock feed milling. A list of GTA Members is attached

Barley statistics

The Australian grains industry has undergone significant change following deregulation of the wheat export market in 2008 and the consequent Wheat Port Code of Conduct which, amongst other obligations, requires the publication of a shipping stem. While the Code applies to wheat, the ports publish shipping stem data for all commodities.

This means that data by load port and destination for all bulk barley shipments is published.

As such GTA does not believe that there is any valid reason for continuation of the confidentiality requirement regarding load port, nor the delayed publication of destination data.

Barley remains the only major grain where such confidentiality requirements apply and GTA does not see that there is justification for barley to be treated as a special case.

The transparency that occurs via the shipping stem would suggest that there seems little basis for maintaining the confidentiality requirement, however, the stem only picks up bulk shipments and thus, access to full ABS data is essential to provide a complete picture of barley exports.

We believe that the request does not appear to have been initiated by any of the major exporters and GTA supports the removal of the confidentiality (refer Attachment 1 for membership list).

Given the changed structure of the industry and the increased need for information to enable the market to operate effectively, we would request that ABS review the confidentiality requirements with a view to removing all constraint/delays on load port and destination data.

We would appreciate your advice on any justification for continuing the confidentiality on barley export statistics by state and destination and why barley warrants a 'special case' compared against other major grains such as wheat and canola.

We look forward to your consideration of this matter and the removal of this restriction.

Please do not hesitate to contact me should you require further information.

Yours sincerely

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

Pat O'Shannassy
CEO



Extracts from Shipping Stem reports demonstrating data by load port

2016/17 Weekly Loaded Vessels

(Weekly loaded vessels by commodity, state, port, vessel name, shipper name and destination)..

2016/17 Weekly Loaded Vessels						
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Commodity	State	Port	Vessel Name	Shipper Name	Destination	
Barley	WA	Esperance	Cemtex Pioneer	Bunge	Vietnam	19,540
			Sth New York	CBH	Republic of Korea	30,000
		Geraldton	Ocean Exporter	CBH	South Africa	20,000

2016-17 Export Summary by Commodity

(Current season loaded and forward stem by commodity, port and month)

	Total	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	2016/17 Total
Barley	454,501	639,703	1,442,905	2,285,677	2,104,187	1,920,280	1,808,536	2,084,385	2,333,257	742,252	264,915	305,000		16,385,598
Carrington				60,000			50,000		59,000					60,000
Port Kembla														119,000
Port Kembla Quattro				33,000	25,000									96,000
Melbourne	33,850				55,000	144,025	100,000		50,000		5,000			387,675
Geelong			55,000	100,000	115,000	161,225	50,000	80,000		44,400				605,625
Portland						60,000				90,000				150,000
Port Adelaide	25,000		65,000	125,000	61,754	206,329	122,000	120,050	133,200	80,000				938,333
Port Giles			36,500			112,637		60,000	23,300	60,000				292,437
Wallaroo			27,000	25,000	48,000	18,800	41,500	50,240						210,540
Port Lincoln	117,500	63,000	140,434	25,000	30,000	30,000		141,515						547,449
Therenaard			4,182	42,200			5,000							51,382
Albany	53,909	23,690	74,080	130,500	149,707	132,895	101,422	96,259	54,155					816,617
Kwinana	65,945	117,273	148,090	356,984	214,661	202,924	40,952	167,500	125,849					1,440,178
Geraldton	17,000			95,727		9,000	16,000	12,039	20,000					169,766
Esperance	22,727	26,000	50,788	147,727	52,500	145,119	100,048	146,678	109,540					801,127
Bunbury			22,000	6,090		25,000								53,090
Total	302,081	263,613	623,074	1,147,228	924,259	1,125,317	636,922	896,581	687,144	80,000	5,000			6,691,219

2016-17 Export Summary by State

(Current season loaded and forward shipping stem by state, commodity and month)

State	Commodity	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	2016/17 Total
NSW	Wheat	122,900	62,000	124,000	487,500	447,952	445,750	318,000	444,200	405,300	90,500	4,500		2,952,602
	Barley				93,000	25,000	50,000		59,000					227,000
VIC	Wheat	50,000	66,000	44,000	194,000	237,300	100,000	89,775	231,500	480,100	320,000	220,000	205,000	2,237,675
	Barley		33,850	55,000	100,000	230,000	305,250	150,000	80,000	184,400		5,000		1,143,300
SA	Wheat	29,939	218,000	502,361	426,046	449,123	391,545	370,000	460,580	469,722	147,282			3,464,598
	Barley	142,500	63,000	273,116	217,200	252,391	255,129	228,500	335,105	193,200	80,000			2,040,141
WA	Wheat	251,862	293,703	737,144	1,042,131	870,562	840,385	968,861	911,605	944,235	136,470			6,996,758
	Barley	159,581	166,963	294,958	737,028	416,868	514,938	258,422	422,476	309,544				3,280,778