

28 February 2018

Agvet Chemicals Branch  
Sustainable Agriculture, Fisheries & Forestry Division  
Department of Agriculture and Water Resources  
GPO Box 858  
Canberra ACT 2601

*Submitted on-line via email [agvetpolicy@agriculture.gov.au](mailto:agvetpolicy@agriculture.gov.au)*

Dear Sir/Madam

**RE: Agvet Chemical Task Group (ACTG) Discussion paper: Off-label Use Harmonisation Proposal**

**1. About Grain Trade Australia**

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, grain for human consumption and stock feed milling. A list of all GTA members is attached.

Within this context, on behalf of its members, GTA provides comment on the Discussion Paper entitled "Agvet Chemical Task Group (ACTG) Discussion paper: Off-label Use Harmonisation Proposal".

**2. General Comments on the Document and Costs for Industry**

GTA agrees with the intent of the review, being "*adoption of a national approach to harmonised off-label use of agricultural and veterinary (agvet) chemicals*". If the project fully achieves its objective various benefits, as outlined in the paper will be realised. However, of significant concern to GTA Members is maintaining customer and marketplace confidence that Australia's regulatory system is world class, supports and facilitates the grain industry meeting customer contract and regulatory requirements for chemical use.

GTA Members trade grain both domestically in Australia and in many overseas countries. While the focus of the paper indicates "international markets", given the large domestic market for Australian grain, it is important that any regulatory reform also considers the views of Australian grain buyers, and ultimately the consumer.

### 3. Specific Comments

#### 3.1 Off Label Use Definition

The Discussion Paper outlines a definition for off label use, with commentary including “*Off-label use relies on a conscious and informed decision to use an agricultural chemical product (either registered or accessible under a permit) to address a specific pest issue. This includes consideration of:*

- *the rate;*
- *time and frequency of application;*
- *the likelihood of residues; and*
- *the potential for exposure.*

*This information may come from international practice, professional judgement and consideration of APVMA approved uses (either label or permit).”*

GTA questions the required level of knowledge of Australian grain growers to fully comprehend, and be able to access the required information as outlined in the above statement. While Australian grain growers use modern farming practices, are updated continually in best practice management (and arguably are using world best practice) their ability to fully comprehend and understand issues such as outlined in the following points is limited due to the nature of the Australian grain industry supply chain:

##### 3.1.1 Likelihood of Residues

It is questionable whether Australian growers and subsequent buyers of grain, would have the required technical knowledge to determine if use of a chemical as proposed in the Discussion Paper, would result in residues. Additionally, the resulting level of residues arising from chemicals used as outlined in the Discussion Paper may be difficult (and costly) to determine if at the level of detection / quantification.

Different markets (both domestic and export) have differing requirements for chemical residues, being the maximum residue limit (MRL). The only way for a grower, and a subsequent buyer of that grain to truly understand the risks of residues arising from a chemical use would be to perform analysis of that grain in a laboratory.

Depending on the commodity/market/chemical, chemical residue analysis of grain prior to selling from a grower is generally not performed for a variety of reasons including but not limited to:

- Cost of analysis, with many analyses being relatively expensive and in general not required under clauses in many Australian grain industry contracts. These additional costs would need to be absorbed by the grower, thereby reducing profitability.
- Generally short timeframe for marketing of grain based on the price achievable at that time. That is, a market opportunity may arise on any given day and subsequently a grower may sell that grain, not permitting time for collection of a sample and analysis in a laboratory.
- Grower compliance with regulatory requirements for chemical use, with compliance generally indicating residues will be below the applicable Australian MRL.

##### 3.1.2 Market Requirements

If residues arise from the use of an off-label chemical, those residues may, or may not be permitted by the market. Significant education is provided to growers:

- Regulatory - such as Control of Use legislation or voluntary commercial training services on chemical application
- Fact Sheets - various education material on chemical use and the impacts of misuse on market requirements
- Market requirements – MRLs for chemicals via various documents and on-line MRL databases

However, the ability of a grower to directly determine a market requirement for a particular chemical is problematic due to the changing nature of those market requirements. MRL reviews continually occur in markets due to a range of issues. Ensuring all growers have up to date information on those changes would be difficult, if not impossible to achieve.

### 3.1.3 End Use of Grain

Unless sold directly to a domestic end-user, or specifically sent to a container packer for direct loading to a particular international destination, grain is generally delivered into the Bulk Handling Company (BHC) storage system. In the BHC storage system it is commingled with grain of the same quality with grain from other growers. Thus the grain in any BHC storage may be from various growers and locations, each delivery having a different range of chemicals and level of those residues.

Upon delivery growers are generally required to complete a Commodity Vendor Declaration (CVD) form that requires the grower to outline amongst other things:

- a) Whether the grain was grown and harvested/stored under an officially recognised quality assurance (QA) scheme.
- b) Specifics of each chemical used on that grain for post-harvest stored grain insect control.
- c) Compliance of chemical use with regulations.

Where the grower declares chemical use, a risk assessment of residues arising will determine if that grain is considered suitable for a particular market. However, the true risk can only be assessed via analysis if all chemicals used are declared on the CVD by the grower. As noted above, this analysis is a very costly exercise.

For grain delivered under point c), under the proposed off label harmonisation proposal, it could be considered that off label use fits under relevant “legislation”. Hence, the grower would not need to declare which chemicals had been used. In this situation, the marketer of that grain would not only need to fully comprehend which chemicals may have been used on that crop (impractical) but also determine if all such chemicals and resultant residues arising from the grain parcel would be suitable for a particular market. Again, this places significant onus and responsibility on both the grower and marketer to identify a chemical that may or may not be present. Such a process would also be costly and totally impractical to implement.

Given the impracticality of the above, it would be difficult to determine, from an industry or regulatory view point if the chemical residue present would be approved (as per the off label use proposed in the Discussion Paper) or as a result of “*Wilful misuse due to the lack of consideration of the risks of using an agricultural chemical product to address a specific pest issue.*” Under this definition, a grower may fall within the wilful misuse definition via not being able to obtain or comprehend the risks of residues arising on the grain in question.

### 3.2 The Need for Off Label Use

GTA has no specific comment on the individual grain sector needs for off label use. It is recognised that many “minor crops” require off label use, and are therefore required to comply with the current regulatory process outlined under the minor use permit system.

Given the relatively small economic incentive for chemical registrants to register chemicals in Australia on these minor crops (e.g., given the limited financial return from chemical sales), the Australian regulatory system must be able to support those industries while also ensuring market requirements including regulatory MRLs are met.

It is noted in the Discussion Paper, that “*The need for off-label use most commonly arises in response to an immediate need by users where an APVMA registered product or APVMA issued permit is not available, cannot be granted in the time required, or it is too expensive to gather required data for approval. This is particularly an issue in small industries with limited capability and resources to organise or fund permits. The Australian Government has committed \$8 million (2014-2018) to this issue through its Improved Access to Agricultural and Veterinary Chemicals initiative.*”

This allocation of funding is commended. As is the approach outlined in Table 2 (Approaches to address inconsistencies), being:

The issue	Approaches
Use of a product on a commodity or in a situation that is not listed on the APVMA approved label	Prohibit use on a crop or situation that is not listed on the APVMA approved label unless the use complies with formal conditions to allow use

It is also noted in the Discussion Paper “*It is also important to note that while the APVMA’s minor use permit system exists to allow for legal off-label use and assist users in assessing and managing risks, the approaches discussed in this paper are outside of this system*”.

In practice, it is difficult for industry to separate these two issues.

Where required, various industry organisations apply for minor use permits on behalf of their stakeholders. Depending on the type of permit applied for, these fees are relatively low per application. Once approved, all growers can use that permit under the conditions outlined.

As outlined in the Discussion Paper, “*the conditional approach prohibits off-label use that is likely to pose unacceptable risks to food suitability and Australia’s trade*”. As with the minor use permit system, an individual grower may not have the necessary skills to conduct a risk assessment and would rely on a third party such as an industry organisation. In addition, it would seem impractical and inefficient for individual minor crop growers to undertake assessments to comply with the off label use conditions where others may also be seeking to use those same chemical(s) in a given situation leading to unnecessary duplication and additional costs.

### 3.3 Comments on Specific Conditions

It is recognised that the Conditions listed in the Discussion Paper (Appendix 3) are examples only and not all may be implemented. The following are comments on specific conditions listed in the Discussion Paper.

#### 3.3.1 Limiting Exposure

Purpose	Example Condition
The risk posed by off-label use will be lowered by reducing the extent of off-label use or excluding higher risk chemicals, commodities or situations.	The commodity is not, or is not likely to be, exported.

In practice in most situations, this Condition could not be easily implemented. Unless direct marketed (e.g., ex farm to a container packer for direct loading into a container), grain is generally commingled in bulk storages with grain of a similar quality from various other sources. Frequently the end-use of this grain is not known, nor is the end destination. In these circumstances, grain may be sent to the domestic or export market, or both, depending on a range of commercial factors.

There are no economically practical systems available for industry to meet this Example Condition. Hence this Example Condition could not be implemented for grain.

#### 3.3.2 Limiting Exposure

Purpose	Example Condition
The risk posed by off-label use will be lowered by reducing the extent of off-label use or excluding higher risk chemicals, commodities or situations.	The use (commodity/product) does not occur any more frequently than two years in every three (for seasonal products) or for six continuous months in every 12 for perennial commodities.

It is unclear how such a restriction on use has arisen. Further review of the reasoning for this frequency of use would be required before additional comments could be supplied.

However, as a general rule, where pests arise, use of a chemical in any one season on more than one occasion may be required. Hence label rates should mitigate the risk of residues arising above MRLs, not statements such as those examples in the table.

#### 3.3.3 Limiting Exposure

Purpose	Example Condition
The risk posed by off-label use will be lowered by reducing the extent of off-label use or excluding higher risk chemicals, commodities or situations.	The use is not on a prescribed major commodity. For example a prescribed major commodity may be major crops as listed in Schedule 3A of the 1 July 2013 compilation of the Agricultural and Veterinary Chemicals Code Regulations 1995.

Minor crops are currently listed on the APVMA website. Also included is a definition of “*Limited use within a major crop*”. Schedule 3A of the Agricultural and Veterinary Chemicals Code Regulations 1995 refers to different crops from the Minor crops listed on the APVMA website.

It is reasonably complex for a grower and others in industry to determine the exact criteria applying to the specific instance / commodity where the off label conditions may be enforced. Further consideration of the above Example Condition plus related Conditions would be required prior to receiving industry support.

### 3.3.4 User Competency & Practices

Purpose	Example Condition
Maximum residue limits (MRLs) ensure the food suitability of produce. Monitoring residues ensures off-label use does not pose a food suitability threat.	Grower/producer participates in a quality assurance scheme that involves/includes produce residue monitoring of the treated commodity for the active constituent in the product used.

Individual grain growers generally do not operate under recognised quality assurance schemes. Growers comply with relevant regulations and voluntary industry management systems, such as the Grain Producers Australia “Growing Australian Grain Guide - Safely managing risks with crop inputs and grain on farm”. This is a Guide only, and while most grower groups and their members within Australia comply with that document, it does not involve a formally recognised QA system, nor does it require chemical residue testing. As outlined previously, the cost of such testing would be prohibitive to growers in most situations.

### 3.3.5 User Competency & Practices

Purpose	Example Condition
Maximum residue limits (MRLs) ensure the food suitability of produce. Monitoring residues ensures off-label use does not pose a food suitability threat.	The person responsible for the use can demonstrate that at the time of the product’s use their knowledge of: the MRL (if any) in Australia New Zealand Food Standards Code for that commodity where the commodity is set out in Table 4 of the Agricultural and Veterinary Chemicals Code Instrument No. 4 (MRL Standard 2012) and is intended (or likely to be) for animal feed, the MRL for that commodity the residues in the commodity arising from the products use.

Growers are generally not aware of market requirements, specifically where a chemical is not permitted for use on a commodity for a specific market. Frequently, when using a registered chemical (and following approved label instructions) a grower would assume that use is permitted and resulting residues will comply with market MRLs. Growers would not refer to the Food Standards Code and / or Table 4 as listed above prior to applying that chemical.

As stated previously, when sourcing grain from growers, generally a Commodity Vendor Declaration form is required to be completed. Various versions may be used, but each requires either:

- A declaration the grain was grown under a recognised QA system; and / or
- Grain was treated (with a post-harvest chemical that requires specifically referencing) and labels etc. were observed; and/or
- Only for specific markets does all in-crop and post-harvest chemicals used require to be listed. Analysis for post-harvest chemicals may or may not be required.

While implicit that growers are aware of legal obligations for MRLs, the above listed Example Condition would require a modification to all industry CVDs and in practice would add little improvement to the compliance of growers with off-label use or use of any chemical registered in Australia.

### 3.3.6 User Competency & Practices

Purpose	Example Condition
User has demonstrated the necessary skills and knowledge to that would allow identification and management of the risks in handling and using chemicals off-label.	The user of the product holds a Certificate III or higher qualification in risk assessment and risk management.

While GTA has no comment on risk skills and training thereof of growers, in general as outlined in the Grower Guide, growers are required to undertake training and be competent in chemical use. It is impractical for growers to undertake training and have recognised skills in risk assessment and risk management in chemical use in relation to the market risk to the degree inferred in this Example Condition. GTA is currently not aware of any training courses offered in this area.

Other avenues are used by industry to assist increasing market knowledge of growers, without the need to undergo formal training in order to use chemicals per se, not including the off label recommendations outlined in this Discussion Paper.

### 3.4 Workplace Health & Safety

GTA makes no comment on this section of the Discussion Paper given that compliance for all GTA Members with all WH&S legislation is mandatory.

## 4. Summary

GTA supports “*The Australian, state and territory governments’ acknowledge that the APVMA is the best assessor of risk of agricultural chemicals. Long-term access is most effectively delivered through APVMA issued permits. The work of government to harmonise off-label use is focused on addressing the short-term chemical needs of producers*”.

A key focus of our markets is confidence in the Australian regulatory system, coupled with an effective industry self-management approach to meeting their quality requirements outlined in contracts.

The approach in the Discussion Paper is intended to provide this confidence through harmonisation of the approach to off label chemical use, however there remains various practical issues that need to be considered further before such a result can be fully achieved.

Thank you for your consideration of this response.

Yours faithfully,



Pat O'Shannassy  
Chief Executive Officer

## Membership List as at 26 February 2018

Organisation

Contact

Website /Phone

### Ordinary Member (Trading)

#### Level A1 (over 7 Million Tonnes)

Co-operative Bulk Handling Limited	Mr Jason Craig	cbh.com.au
Glencore Agriculture Pty Ltd	Mr Philip Hughes	glencoreagriculture.com.au

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#### Level A2 (5 - 7 Million Tonnes)

Graincorp Operations Ltd	Mr Klaus Pamminger	graincorp.com.au
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#### Level A3 (3 - 5 Million Tonnes)

ADM Trading Australia Pty Ltd	Mr Darryl Borlase	adm.com
Cargill Australia Limited	Ms Penne Kehl	cargill.com.au

2

#### Level A4 (1.5 - 3 Million Tonnes)

Bunge Agribusiness Australia Pty Ltd	Mr Chris Aucote	bunge.com/Agribusiness
Cofco International	Mr Bruce Li	cofcoagri.com.au
Emerald Grain Pty Limited	Mr David Johnson	emeraldgrain.com
Nidera Australia Pty Ltd	Mr David Lengren	nidera.com
Plum Grove Pty Ltd	Mr Tony Smith	plumgrove.com.au

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#### Level B1 (1.0 - 1.5 Million Tonnes)

Arrow Commodities Pty Ltd	Mr Dominic Vanzella	arrowcom.com.au
Louis Dreyfus Company Australia Pty Ltd	Mr Robert Green	louisdreyfus.com.au

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#### Level B2 (500,000 - 1 Million Tonnes)

Agrex Australia Pty Ltd	Mr Hiro Oda	agrexaustralia.com.au
Australian Grain Export Pty Ltd	Mr John Thiele	08 8832 2800
CHS Broadbent Pty Ltd	Mr Justin Fay	broadbentgrain.com.au
Centre State Exports Pty Ltd	Mr Jeff Voigt	centrestateexports.com.au
George Weston Foods Limited	Mr Mark O'Brien	gwf.com.au
Ridley Agriproducts Pty Ltd	Mr Michael Reeves	agriproducts.com.au
Riordan Grain Services	Mr Bradley Hogan	riordangrains.com.au
Riverina (Australia) Pty Ltd	Mr Jon Mulally	riverina.com.au

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#### Level B3 (250,000 - 500,000 Tonnes)

Agfarm Pty Ltd	Mr Ron McCalman	agfarm.com.au
Agracom Pty Ltd	Mr Joe Hallman	agracom.com.au
AGRIGRAIN	Mr Jeremy Brown	agrigrain.com
Agrisk Management Pty Ltd	Mr Brett Stevenson	02 9499 4199
Allied Pinnacle Pty Ltd	Mr Josh Lawrence	alliedmills.com.au
Elders Grain	Mr Lachlan Allen	elders.com.au
Lempriere Grain Pty Ltd	Mr Jonathan Holdsworth	lemprieregrain.com.au
Quadra Commodities Pty Ltd	Mr Robin Cassar	quadra.com
Robinson Grain Trading Co Pty Ltd	Mr Gary Robinson	robinsongrain.com.au
Special One Grain Accumulator	Ms Jaimee Carrigan	specialonegrain.com.au
United World Enterprises Pty Ltd	Mr Jimmy Liu	uwetypical.com
Wilmar Gavilon Pty Ltd	Mr Matt Albion	07 3713 8700

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## Ordinary Member (Trading) (contd)

### Level C (under 250,000 Tonnes)

A T Waterfield & Son Pty Ltd	Mr Brad Waterfield	03 5382 3725
A W Vater and Co	Mr Kim Vater	vater.com.au
Access Grain Pty Ltd	Mr Wade Humphreys	accessgrain.com.au
Adams Australia Pty Ltd	Mr Ian Mack	adamsaustralia.com.au
Agmark Commodities	Mr Richard Alcorn	agmark.com.au
Agri Om Australia Pty Ltd	Mr Kishore Bulchandani	agriom.com.au
Agri-Oz Exports Pty Ltd	Mr Francois Darcas	03 9830 7021
Agriex Australia Pty Ltd	Mr Joseph Khnessier	02 9232 0690
Agrifoods Australia	Mr Rob Anderson	agrifoodsaustralia.com.au
Agromin Australia Pty Limited	Mr Rajni Patel	agromin.com.au
AGT Foods Australia	Mr Peter Wilson	agtfoods.com/australia
AMPS Agribusiness Group	Mr Simon McDougall	ampsagribusiness.com.au
Associated Grain	Mr Todd Jorgensen	07 4662 1999
Auscott Ltd	Mr Peter Webb	auscott.com.au
AusiCan Commodities	Mr Palwinder Singh	ausican.com
Australian Choice Exports Pty Ltd	Mr James Hunt	australianchoiceexports.com.au
Australian Grain Growers Co-operative Limited	Mr Bruce McDonald	aggcoop.com.au
Australian Grain Storage	Mr Matt Bailey	sunrice.com.au
Australian Growers Direct Pty Ltd	Mr Tom Lucas	ausgrowersdirect.com.au
Australian Mungbean Company Pty Ltd	Mr Damien White	australianmungbean.com.au
Australian Storage Alliance Pty Ltd	Mr Jon Bucknall	0447 652 716
AvantAgri Australia Pty Ltd	Mr Peter Woods	avantagri.com.au
Baker Grain	Mr Richard Baker	bakergrain.com.au
Berriwillock Grain Storage Co-Operative Ltd	Mr Tony Bellinger	moulameingrain.com
BFB Pty Ltd	Mr Terry Brabin	bfb.com.au
Blairs Produce Company	Mr Sean Blair	02 6025 4600
Boolah Grains Pty Ltd	Mr Stuart Tighe	02 6754 0343
Boort Grain Co-Operative	Mr Jon Bucknall	02 9875 3919
Broun and Co Grain Pty Ltd	Mr Wal Broun	brounandco.com.au
C & S Trading Pty Ltd	Mr Craig Scholz	scholzbh.com.au
C K Tremlett Pty Ltd	Mr Andrew Tremlett	08 8524 9050
Carpendale Commodities	Mr Andrew Kluck	0448 761 246
Cameron Pastoral Company Pty Ltd	Mr Ken Cameron	07 4671 4144
Castlegate James Australasia Pty Ltd	Mr Ross Giovanetti	castlegatejames.com.au
Cleveland Agriculture	Mr Chris Hurwood	02 6756 5004
Coorow Seeds	Mr Brian Pover	coorowseeds.com.au
COPRICE	Ms Kirsty Cutter	coprice.com.au
Cremer Australia Pty Ltd	Mr Scott Haughton	cremer.com.au
DA Hall and Co	Mr Bruce Holden	07 4695 5777
Dalby Bio-Refining Limited		dbrl.com.au
Dalgrains (Qld) Pty Ltd	Mr Tobin Cherry	dalgrains.com
Darwalla Milling Co Pty Ltd	Mr Gary Heidenreich	07 3822 0527
Deacon Seeds Company	Mr Terry Deacon	07 4662 3217
Deckert Group Pty Ltd	Mr Chris Deckert	deckerts.com.au
Defiance Maize Products Pty Ltd	Mr Rodney Walker	corson.co.nz
Demeter Cormack Pty Ltd	Mr David Oates	08 6389 0098
Direct Commodities Pty Ltd	Mr Hamish Robertson	directcommodities.com.au
Donnellons Bulk Haulage Pty Ltd	Mr Bill Donnellon	0428 136 483
ED & F Man Grains Australia	Mr Oliver White	edfman.com
East Coast Stockfeed Pty Ltd	Mr Stuart Dolden	ecsf.com.au
Export Trading Group Australia Pty Ltd	Mr Shayne Clark	etgworld.com
Feed Central Pty Ltd	Mr Tim Ford	feedcentral.com.au
Fellows Nominees	Mr Paul Fellows	fellowsbulk.com.au
FertInvest Pty Ltd	Mr Preyesh Barar	fertinvest.com
Findlays Barellan	Mr Neil Findlay	02 6963 9246

**Level C (under 250,000 Tonnes) cont.**

Five Star Stock Feeds	Mr Tim Huggins	fssf.com.au
Fletcher International Exports Pty Ltd	Mr Kurt Wilkinson	fletchint.com.au
FREE Eyre Grain Pty Ltd	Mr Mark Rodda	free-eyre.com.au
Golden Harvest Grain Exports	Mr Chandru Hiremath	goldenharvest.net.au
Grain Direct Australia	Mr Chris Kochanski	graindirect.com.au
Grain Link (NSW) Pty Ltd	Mr Paul Pearsall	02 6962 9500
Grain Link WA Pty Ltd	Mr Andrew Goyder	grainlink.com.au
Grainforce Pty Ltd	Mr Derek Larnach	02 6331 4880
Grainpro Pty Limited	Ms Angela Bonfante	grainpro.com.au
GrainTrend Pty Ltd	Mr Sanjiv Dubey	graintrend.com
Greentree Farming	Mr David Brown	02 6751 1228
GV Grain & Fodder	Ms Joanne Harry	03 5828 3063
Hanlon Enterprises Grain	Mr Peter Gerhardy	02 6924 1781
Harberger's Farm Supplies (Trading) Pty Ltd	Mr Reece Harberger	harberger.com.au
Hassad Australia Operations Company Pty Ltd	Ms Terrie Morgan	02 9900 3700
Iloura Resources Pty Ltd	Mr Hans Hol	iloura-resources.com
Independent Grain Handlers Pty Ltd	Mr Brad Bryant	igh.net.au
Irwin Stockfeeds	Mr Bryan Irwin	irwinstockfeeds.com.au
Itochu Australia Ltd	Mr Justin Swan	www.itochu.com.au
J K International Pty Ltd	Mr Sandeep Mohan	jki.com.au
J W Koek & Company	Mr Brian Algate	07 3341 4548
James Stock Feed and Fertilizer Pty Ltd	Mr Adrian Moule	jamesstockfeed.com.au
Jerilderie Grain Storage & Handling	Mr David Barlow	03 5886 0344
KB Agri Services Pty Ltd	Mr Karl Bliss	07 4634 4320
K M & W M Kelly & Sons	Mr Matt Kelly	kellygrains.com.au
Kangaroo Island Pure Grain Pty Ltd	Ms Emma Tonkin	kipuregrain.com
Kennett Rural Services Pty Ltd	Mr Andrew Kennett	kennetrural.com.au
Lachlan Commodities Pty Ltd	Mr Tony Cogswell	02 6851 2077
Laharum Bulk Handling Co	Mr Donald Carter	03 5381 2666
Lake Grain Pty Ltd	Mr Derek Davis	lakegrain.com.au
Lane Grain Pty Ltd	Mr Garry Lane	02 6887 3309
Laragon Almond Processors Pty Ltd	Mr Mark Webber	laragon.com.au
Laucke Flour Mills P/L	Mr Roger Laubsch	laucke.com.au
Lawson Grains Pty Ltd	Mr Angus Blair	lawsongrains.com
LDC Enterprises Australia Pty Ltd	Mr Richard Porter	07 3253 5999
LINX Cargo Care	Mr David Simpson	linxcc.com.au
LPC Trading Pty Ltd	Mr Simon Langfield	02 6383 7222
Malteurop Australia Pty Ltd	Mr Jack King	03 5277 1950
Matthews Transport and Grain Traders	Mr Neville Matthews	08 9831 1021
Max Grains Pty Ltd	Mr Jack Fahy	maxgrains.com.au
MC Croker Pty Limited	Mr Greg Carroll	crokergrain.com.au
McNaughts Grain & Fertilizer Pty Ltd	Mr Daniel McNaught	mчнаughts.com
Melaluka Trading Pty Ltd	Mr Simon Pritchard	melalukatrading.com.au
Mellco Pty Ltd	Mr Steve Mellington	0419 867 971
Moulamein Grain Co-Operative Ltd	Mr Tony Bellinger	moulameingrain.com
Moxey Farms Pty Limited	Ms Jill Smith	02 6344 8462
MSM Milling Pty Ltd	Mr Peter MacSmith	02 6364 5999
Murrumbidgee Grains Pty Ltd	Mr Peter Hassall	02 6937 9100
Namoi Cotton Ltd	Mr Shane McGregor	namoicotton.com.au
Nandaly Grain Co-Operative Ltd	Mr Tony Bellinger	03 5078 1217
Network Grains Pty Ltd	Mr Craig Dennis	07 4637 8500
Newcastle Agri Terminal Pty Ltd	Mr Jock Carter	02 4962 4006
Northern Riverina Grains Pty Ltd	Mr Jon Bucknall	02 9875 3919
OOMA Enterprises NSW Pty Limited	Mr Malcolm Berry	oomaenterprises.com.au
Origin Grain Pty Ltd	Mr Peter Brick	03 5720 8500
PB Seeds Pty Ltd	Mr Peter Blair	pbseeds.com.au

**Level C (under 250,000 Tonnes) cont.**

PeaCo	Mr Shane Wall	03 5497 1766
Pearson's Grain Pty Ltd	Mr Darren Pearson	pearsonsgroup.com.au
Peters Commodities Pty Ltd	Mr Michael Oxley	petcom.com.au
Phoenix Global Australia Pty Ltd	Mr Jogesh Virk	phoenixcommodities.com.au
Premium Grain Handlers P/L	Mr John Orr	pgh.com.au
Preston Grain	Mr Andrew Kell	02 6977 1733
Pulse Association of the South East (PASE) Inc	Ms Leanne Burr	08 9071 3655
Quattro Ports	Mr Dene Ladmore	quattroports.com.au
Quirindi Grain & Produce	Mr John Webster	02 6746 1911
Reid Stockfeeds Pty Ltd	Mr Ian Reid	reidstockfeeds.com.au
Rhodium Resources Australia Pty Ltd	Mr Mark Fitzgerald	rhodiumresources.com
Rivalea (Australia) Pty Ltd - Animal Nutrition	Mr Andrew Philpotts	rivalea.com.au
Riverina Oils & BioEnergy Pty Ltd	Mr Lachlan Herbert	riverinaoils.com
Roty Grain Store	Mr Brian Newman	02 6988 8221
Ruddenklau Grain Pty Ltd	Mr Tim Ruddenklau	08 8842 1314
Rural Logic (Aust) Pty Ltd	Mr Michael Wood	rurallogic.com.au
SANWA Pty Ltd	Mr Charles Emerson	sanwa.com.au
Seedhouse Tasmania	Mr Matthew Crane	seedhouse.com.au
Shannon Bros Bulk Haulage	Mr Clayton Shannon	03 5390 2264
Silo Bag Grain (NSW QLD) Pty Ltd	Ms Lesley Kilby	02 6847 1788
Societa Cofica Pty Ltd	Mr Dia Ram Sharma	societacofica.com.au
Southern Cotton Trading Pty Ltd	Mr Chris Veness	02 69 552 779
Southern Grain Storage Pty Ltd	Mr Campbell Brumby	03 5267 2351
Southern Stockfeeds (Operations) Pty Ltd	Mr David Jemmet	03 5437 8295
Spagrimon Australia Pty Limited	Mr Jiger Kotecha	spagrimon.com.au
Standard Commodities Australia Pty Ltd	Ms Elizabeth Bozinoska	stancom.com.au
Summer Hill Grains	Mr Barney Hughes	0428 694 363
SunPork Farms Feed Mills	Mr Mark Young	08 8532 4434
Tasmanian Agricultural Producers Pty Ltd	Mr David Skipper	tasagproducers.com.au
Thallon Grains Pty Ltd	Mr Andrew Earle	02 6756 5004
TSS Grain	Mr Trevor Macleod	tasstockfeed.com.au
Twynam Pastoral Company	Ms Lesley Heidtman	twynam.com
Ulusoy Asia Pacific	Mr Mark Madjarevic	ulusoyflour.com
Unigrain Pty Ltd	Mr Ervin Leong	unigrain.com.au
Unique Grain Management Pty Ltd	Mr Mark Thiele	uniquegrain.com.au
Universal Commodity Management	Mr Tim Dean	commoditymanagement.com.au
W B Hunter Pty Ltd	Mr Stewart Coombes	03 5821 5744
Ward McKenzie Pty Ltd	Mr Geoff Hammon	mckenziefoods.com.au
Watershed Commodities	Mr Jack Vivers	0427 715 543
WHG Oceania Pty Ltd	Gesheng Shen	02 8040 3030
Whyalla Beef Pty Ltd		whyallabeef.com.au
Wilken Grain	Mr Richard Wilken	wilkens.com.au
Wimpak Pty Ltd	Mr James French	wimpak.com.au
WW Agri Pty Ltd	Mr Steve Sloss	wwagri.com.au
XLD Grain Pty Ltd	Mr Lachie Stevens	xldgrain.com.au
Yenda Prods Grain Pty Ltd	Mr Luke Mancini	0437 512 322

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**Transport Operator**

Gehrke Grains and Transport Pty Ltd	Mr Julian Gehrke	07 5465 6695
Hamilton Contracting (NSW) Pty Ltd	Ms Jodie Hamilton	hamiltoncontracting.com.au
Wakefield Grain Export Services	Mr Bikash Ram	wakefields.com.au

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## Broker

### Large

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### Medium

Grain Brokers Australia	Mr Jeff Winspear	grainbrokers.com.au
Horizon Grain Brokers Pty Ltd	Mr Ash Munro	horizongb.com.au
INTL FCStone Pty Ltd	Mr Brett Cooper	intlfcstone.com
McDonald Pelz Australia	Mr Peter Geary	mcdonaldpelz.com
Perkins Commodity Brokers	Mr Craig Perkins	03 9645 6846
Southern Aurora Markets	Mr Pat Cogswell	samarkets.com.au
Teague Australia Pty Ltd	Mr Tim Teague	teague.com.au

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### Sole Operator

A C Grain	Mr Adam Clarke	0400 065 763
ACCB Australia	Mr Andy Cunliffe	0455 105 300
Allied Grain Pty Ltd	Mr Angus Wettenhall	alliedgrain.com.au
Cereal Milling Services Pty Ltd	Mr Michael Moss	02 4323 9339
Cogeser (Australia) Pty Ltd	Mr Robert Luetolf	cogeser.com.au
Farm Tender	Mr Matt Henke	farmtender.com.au
Link Brokering	Mr Dion Costigan	linkbrokering.com.au
Lotema Pty Ltd	Mr Todd Lees	lotema.com.au
Mallon Commodity Brokering	Mr Ian Mallon	
Quest Commodities Pty Ltd	Ms Jayne Barker	questcommodities.com.au
Wimmera Mallee Grain Services	Mr Rodney Edgerton	egrainservices.com.au
Woodside Commodities Pty Ltd	Mr Hamish Steele-Park	woodcomm.com.au

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## Corporate

### Large

ASX Limited	Mr Kristen Hopkins	asx.com.au/grainfutures
Australia And New Zealand Banking Group	Mr Ian Hanrahan	anz.com.au
Australian Grain Technologies Pty Ltd	Mr Tristan Coram	agtbreeding.com.au
Commonwealth Bank of Australia	Mr Tom Barraket	commbank.com.au

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### Medium

Agrifood Technology Pty Ltd	Ms Doreen Fernandez	03 9742 0589
AMSPEC	Mr Lee Shilvock	amspecgroup.com
Australian Superintendence Company	Mr Andrew Parry	07 3391 8640
Commodity Inspection Services (Australia) Pty Ltd	Mr Mathew Conoulty	commodityinspection.com.au
Foss Pacific Pty Ltd	Mr Simon Kirkman	foss.com.au
Holding Redlich	Mr Geoff Farnsworth	holdingredlich.com
Holman Fenwick Willan	Mr Stephen Thompson	hfw.com
Intertek	Mr Ben Jones	intertek.com
Merricks Capital Pty Limited	Mr Adam Davis	merrickscapital.com
SBA Law	Mr Jeremy Rosenthal	sbalaw.com
SGS Australia Pty Ltd	Mr Scot Paterson	au.sgs.com

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### Small

Advance Trading Australasia	Mr Andrew Woodhouse	advance-trading.com.au
Ag Scientia Pty Ltd	Mr Lloyd George	03 9598 1980
Basis Commodities Pty Ltd	Mr Chris Whitwell	basiscommodities.com.au
Clear Grain Exchange	Mr Nathan Cattle	cleargrain.com.au
CloudBreak Grain Marketing Pty Ltd	Mr Ed Scamps	08 8388 8084
Delta Agribusiness Pty Ltd	Mr Michael Parry	02 6772 0000

## Corporate (cont.)

### Small

EP Integrated Commodities Pty Ltd	Ms Tracey Lehmann	08 8627 2304
Farmanco Marketing Pty Ltd	Mr Donald McTaggart	farmanco.com.au
FarMarCo Australia Pty Ltd	Mr Robert Imray	07 4637 6400
Finesse Solutions Pty Limited	Mr Malcolm Finlayson	02 9872 9270
Flexi Grain	Mr Jarrod Tonkin	flexigrain.com.au
Goldstar Commodities	Mr Geoff Webb	goldstarcommodities.com.au
Grainx	Mr Chris Hood	grainx.com.au
HarvestCheck Pty Ltd	Mr Stephen Schumacher	0418 199535
Hay Plains Grain Storage Pty Ltd	Mr Ron Harris	0404 444 600
IKON Commodities Pty Ltd	Mr Simon Clancy	ikoncommodities.com.au
Lachstock Consulting	Mr Lachie Stevens	xldgrain.com.au
MarketAg Pty Ltd	Mr Mark Martin	02 6747 1590
McMullen Consulting Pty Ltd	Mr Gerard McMullen	03 8300 0108
Mercari Pty Ltd	Mr Scott Still	mercari.com.au
Mirfak P/L	Mr Mark Murphy	mirfak.com.au
Murray Goulburn Trading Pty Ltd	Mr Gerard Murphy	03 5862 2799
NZX Australia (ACF, PFA)	Ms Hannah Janson	nzx.com
OMIC Australia Pty Ltd	Mr Yasuhide Okumura	omicaustralia.com.au
Perten Instruments Australia Pty Ltd	Mr Raul Ovelar	02 9870 3400
Pinnacle Commodities Pty Ltd	Mr Rod Buckle	pinnaclecommodities.com.au
Planfarm Marketing Pty Ltd	Mr Jerome Critch	planfarm.com.au
Plansafe Logistics Pty Ltd	Mr Mark Sloan	plansafelogistics.com.au
Primal Foods Group	Mr Peter Longhurst	02 8011 4182
Rise Agribusiness Pty Ltd	Mr Ian Dalglish	riseagri.com.au
Rural Directions Pty Ltd	Mr Chris Heinjus	ruraldirections.com
SGA Solutions Pty Ltd	Mr David Hudson	03 5428 4990
TE Storage & Logistics Pty Ltd	Mr Tom Hage	08 8762 2188
Ten Tigers	Mr Chris Tonkin	tentigers.com.au

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## International Affiliate

CCIC Australia Pty Ltd	Mr Isherwood Feng	02 9580 3212
CIS - Commodity Inspection Services	Mr Paul Schweitzer	cis-inspections.com

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## Industry Association

Australia Export Grain Innovation Centre	Mr Richard Simonaitis	aegic.org.au
Grain Growers Limited	D. McKeon/M. Southan	graingrowers.com.au
Grain Industry Association of WA	Ms Larissa Taylor	giwa.org.au
Grain Producers Australia Ltd	Mr Andrew Weidemann	grainproducers.com.au
NSW Farmers Association	Mr Robert Hardie	02 9478 1000
Victorian Farmers Federation	Mr Stephen Sheridan	03 9207 5555

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## Merchant Association

Grain Industry Association of SA	Ms Rebecca Freeman	0414 844 425
Grain Industry Association Of Victoria	Mr Colin Peace	giav.com.au
Grain NSW Inc	Ms Joanne Ware	grainnsw.com.au
Queensland Agricultural Merchants Inc.	Mr John Francis	qam.org.au

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## Life Members

Mr Mervyn May	Retired	Awarded 1998
Mr Christopher Kelly	K M & W M Kelly & Sons	Awarded July 2015
Mr Geoff Honey ( <i>Posthumously awarded</i> )	Former GTA CEO	Awarded July 2016

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