16th May 2017

GRAIN PRODUCERS AUSTRALIA

Pat O'Shannassy
Chairman
GTA Standards Committee

c/o submissions@graintrade.org.au

Re: Grain Producers Australia concerns regarding proposed grain standards changes

Dear Pat,

Grain Producers Australia wishes to again reiterate its concerns about the changes GTA is making to standards that would be better dealt with through negotiation of individual contract terms and conditions between grain buyers and grain producers.

In particular, GPA wishes to clearly state the concerns and to emphasise our lack of support for the proposed changes to standards for feed barley.

In order to foster transparency and clear information flow it is necessary to have standards which provide clear messages to grain producers. Changes to standards should be supported by research available to members for review, and in the case of feed quality grain receival standards, the recommended changes should be clearly supported as necessary by the stockfeed industry.

To have feed barley standards set at restrictive levels in order to facilitate use of feed barley as a human consumption product is inappropriate. It highlights a conflict of interest and raises questions regarding the role of GTA in appropriately managing the standards as both an industry good function and a message to growers and the market regarding required quality for different end use customers.

It has become clear that grain trades/marketers are selling higher standard feed barley for use in the human consumption market. It would be more appropriate to create an additional malt category to transparently cater for this market and provide the market signals to growers, and payment for better quality.

GPA therefore opposes the proposal to group F1 in with malting grade barley with regards the tolerance for severely damaged grain. The justification is based on visual impact and end use and

therefore it is not appropriate to group tolerances for feed categories in with malt. Malting tolerances should reflect the human consumption end use, no justification has been provided by GTA to support why a feed category needs tightened tolerances.

Proposed tolerance for severely damaged grain

Malt 1, Malt 2, Malt 3, F1	1 grain / 0.5L
F2	5 grains / 0.5L

GPA Recommendation: F1 should have a tolerance for severely damaged grain, which recognises it is a feed quality grain not intended for human consumption uses, therefore preferably 5 grains per half litre.

Overall the recent changes made to a number of the requirements for F1 eg snail tolerances should be readjusted to reflect actual market requirements and the advertised end use market as a stock feed product.

Thank you for the opportunity to provide a submission.

Regards,

Regards,

Andrew Weidemann
Chairman
Grain Producers Australia Ltd