

9<sup>th</sup> April 2018

Mr Pat O'Shannassy  
Grain Trade Australia  
PO Box R1829  
Royal Exchange, Sydney NSW 1225  
Via email: pat.oshannassy@graintrade.org.au

cc: submissions@graintrade.org.au

Dear Pat,

**RE: GTA 2018/19 Standards– Snail Tolerances, Possible Barley Name Change, Standards Database**

GrainGrowers is a grain farmer representative organisation with more than 17,000 members across Australia. GrainGrowers' goal is a more efficient, sustainable and profitable grain production sector that benefits all Australia grain farmers and the wider grains industry.

GrainGrowers welcomes the opportunity to provide feedback to the Grain Trade Australia Standards Committee regarding the 2018/19 Standards.

**1: Snail Tolerance in Barley (ITEM 3.6)**

GrainGrowers respects the need to ensure that grain Trading Standards reflect the requirements of domestic and export markets, whilst also ensuring that the Standards are practically achievable for both the production sector and broader supply chain. As such, GrainGrowers does not oppose the proposal to revise the tolerance for Snails in Malt 1, Malt 2, Malt 3 and F1 barley from 2 snails per ½ L to a new tolerance 1 snail per ½ L.

**2: Possible Renaming of Barley Grades (ITEM 4.2)**

GrainGrowers recommends the GTA Standards Committee change the name of Feed 1 barley to more accurately reflect the actual end-use of Feed 1 (and Feed 2) in market. GrainGrowers is aware of the fact that Australia's largest barley buyer, China, regularly procures barley on a "Fair Average Quality (FAQ)" specification, which may be used for malting purposes, and this contractual specification can be met with Feed 1 barley. Furthermore, GrainGrowers agrees with the following statements from GTA:

- *There is some confusion among industry on the use of Feed 1 barley. This has implications for the segregation, pricing and other issues of the various barley grades.*
- *The Feed 1 grade may be used for a number of different purposes by different markets, including for malting and for stockfeed. On receipt of grain, the intended end-use may not be known.*

GrainGrowers is supportive of a formal change in name of Feed 1 barley to more accurately reflect the fact that this grade of barley can (and currently is) used for a range of stockfeed, malting and other uses.

Suggested name changes include (in order of preference):

Proposed name	Pro	Con
<b>Multi-purpose barley (MP1 &amp; MP2)</b>	<ul style="list-style-type: none"><li>“Multi” shows a clear signal that the grade can be used for multiple end uses (Malt or Feed).</li></ul>	<ul style="list-style-type: none"><li>There may be confusion between “Malt” grades and “Multi” grades.</li></ul>
<b>Barley 1 and Barley 2 (B1 &amp; B2)</b>	<ul style="list-style-type: none"><li>No specification of end-use means there should be no preconceived assumptions based on misleading name</li></ul>	<ul style="list-style-type: none"><li>Perhaps considered too broad</li></ul>
<b>All-Purpose barley (AP1 &amp; AP2)</b>	<ul style="list-style-type: none"><li>“All” indicates the grade is suitable for many end uses.</li></ul>	<ul style="list-style-type: none"><li>Perhaps considered too broad</li></ul>
<b>General-purpose barley (GP1 &amp; GP2)</b>	<ul style="list-style-type: none"><li>“General” indicates the grade is suitable for many end uses.</li></ul>	<ul style="list-style-type: none"><li>There may be natural comparison with General Purpose (GP) wheat, which is a lower functionality, lower price product.</li></ul>

GrainGrowers would be happy to consider alternative names that provide the appropriate signals to growers and end users.

### 3: Standards Database and Statement of Standards (ITEM 3.5)

GrainGrowers notes that during 2017 GTA, on behalf of industry, undertook and completed a project to place all commodity Standards (including wheat) on a Standards Database. We note GTA’s statement that “As industry can now use that database to download all relevant Standards (by applying to GTA for access), there is no further need to produce the Statement of Standards”.

GrainGrowers is not opposed to the transition of the “Statement of Standards” to the “Standards Database” that is located on the GTA website. Yet we do not agree that access to the Database should be granted by “applying to GTA”. Trading Standards should be easily accessible to all participants within the Australian grain supply chain and therefore should not require an application process and/or login.

Yours sincerely,



Luke Mathews

GrainGrowers Trade and Economics Manager

