

Member Update

UPDATE 2 OF 22 • 1 March 2022

TOPIC: 1st Industry Call for Submissions on 2022/23 GTA Standards

DISTRIBUTION: GTA Members – primary contact list. Please circulate to all appropriate internal parties.

1. Issue

During deliberations on the development of Grain Trading Standards (Standards) for the 2021/22 season, industry feedback was received by GTA on the proposed changes for 2021/22, and **potential changes for the following 2022/23 season.**

The GTA Trading Standards Committee (Committee) has recently met to discuss industry feedback received and the potential Standards for 2022/23.

This document is provided for industry consideration. It lists the following information on the 2022/23 Standards:

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2. Process for Industry Feedback

The Committee is seeking industry comment on the issues outlined in this document and on any other Standards related issue.

Submissions should be received by COB Tuesday 22nd of March 2022.

Please lodge your submissions by sending to submissions@graintrade.org.au and title your email – Standards Review 2022/23.

Industry is encouraged to provide supporting evidence for any change proposed in Standards. Preference is for industry to use the proforma for lodging submissions located on the GTA website at <http://www.graintrade.org.au/committees>.

Unless marked “confidential” and appropriate supporting reasons are provided, all submissions will be placed on the GTA website for industry review.

3. Agreed Changes for Adoption in 2022/23

3.1 Agreed Change: Visual Recognition Standards Guide – All Commodities

While a revised version was published for the 2021/22 season, the Committee has agreed further changes are required for some commodities. A revised version for 2022/23 is intended to be published incorporating revised photographs and wording for various defective grain quality parameters. These changes are to provide greater clarity and aid industry interpretation.

A draft of the revised version will be available for review by industry during the second-round call for industry submissions expected in April/May 2022.

3.2 Agreed Change: Minor Wording Changes & Other Issues – All Cereal Commodities

Minor changes to wording in all relevant Standards charts and Standards booklets will occur. These changes will refer to the latest versions of reference material available to assist industry implementation of Standards, including:

- Visual Recognition Standards Guide for 2022/23.
- The document entitled "Australian Grains Industry Post Harvest Chemical Usage Recommendations and Outturn Tolerances 2022/23" (see <https://www.graintrade.org.au/sites/default/files/NWPGP/Outturn%20Tolerances%20202122%2031Aug21e.pdf>).

3.3 Agreed Change: Varietal Master List – Wheat, Barley, Oats

As in previous seasons, the Varietal Master List for the above commodities will be reviewed following receipt of the changes from the industry sectors responsible for maintenance of those lists. All Standards will be revised based on those changes and advised to industry when the 2022/23 season Standards are released.

3.4 Agreed Change: Contaminants - Millrun

A submission in 2021 requested a change in the tolerance to be applied for contaminants for Millrun products. The request was that the Standards that were applied in 2015/16 be re-introduced, being a nil tolerance for contaminants. Additional information was sought from industry sectors involved in Millrun production and use on this proposal.

The review indicated that the prior change was unintentionally made and recommended that the Standard revert to a nil tolerance for contaminants as previously applied. This will occur for the 2022/23 season for Millrun.

The Standard will refer to the following example for Wheat* Millrun:

NIL ACCEPTANCE:

- *Toxic matter or chemicals prohibited by National or State Laws against inclusion in Stockfeed, gravel, stones or other injurious matter such as glass, metal or any substance harmful to animal health.*
- *Salmonella must be absent.*
- *Chemical residues are not to exceed the MRLs established by the APVMA for wheat* bran.*
- *To be free of water damage, rodent and insect infestation.*
- *To be free of any foreign materials such as unground screenings, straw, wheat* chaff, wheat seeds of any other commodity, weed seeds etc.*

The description would be altered to reflect the above, being:

DESCRIPTION:

- Consists of coarse wheat* bran, fine wheat* bran, wheat* pollard and wheat* flour.

4. Issues for Further Ongoing Consideration

4.1 Further Research: Vacuum Sampling of Road Trucks – All Commodities

Industry was advised of a proposal raised in 2018 to review the current use of vacuum probes to obtain a representative sample for the purposes of applying Trading Standards. It was agreed this project should be managed as a whole of industry review. GTA through GTA's Trading Standards Committee offered to facilitate the project on behalf of industry, as it relates to the application of Standards.

The project development phase has been completed and funding sourced. There has been a delay in conducting the project due to Covid-19 restricting access to trial sites. It is hoped the trial can commence in 2022.

4.2 Further Research: Justification of Trading Standards – All Commodities

A request was received from industry on why certain tolerances existed in Standards for some commodities. Over time, the justification for Standards may not be as transparent as originally intended for several reasons including staff turnover, decisions are historical and not altered for many years.

The Committee recognised the value in providing supporting information to industry. It was noted that the topic includes a wide range of quality parameters and would utilise significant resources if all topics were to be addressed. The Committee agreed to progress the matter based on priority and will develop a list of higher priority parameters to address initially.

4.3 Further Consideration: Non-Industry Classified Varieties – All Commodities

In 2020 the Committee was requested to develop a GTA grade for a wheat variety that at that point in time did not require the usual classification for wheat varieties (by Wheat Quality Australia (WQA)). The request arose because the variety was bred for a specific purpose outside of the normal use of milling/feed wheats in Australia. After reviewing the Committee could not agree on development of a new grade as the procedures and charter of the GTA Standards Committee did not cover such a situation.

Since that time other grades and classes are being developed for future release to industry and WQA has announced it has created new wheat classes including Australian Innovative Wheat. The Committee continues to review its charter and develop appropriate procedure to cover the above events of new classes and varieties, for wheat and all other commodities. It is expected to be finalised and released during 2022.

4.4 Further Research: Nil Tolerance Parameters – All Cereal Commodities

The Committee had previously advised industry of a review of various aspects related to this topic including:

- The definition of Nil.
- The applicability of a Nil tolerance to apply for each quality parameter in a bulk grain load.
- Regulatory impacts of any potential change away from Nil.
- Suitable tolerances by quality parameter and commodity to apply.
- The consistency of the definitions and tolerances across commodities.
- The method of assessment, including sample size.

During 2021 the Committee considered a potential change to the contamination of grain with *Eucalyptus spp*, specifically gumnuts. The review recommended no change given the impact of gumnuts as a tainting agent in grain. Following completion of the recent harvest, industry has requested further advice on the outcome of that review.

To assist industry to understand the current Standards, the Committee will develop a Fact Sheet for provision to industry outlining the nature of the issue and the reasons why no change to the current tolerances have been recommended.

4.5 Further Research: Foreign Material – All Cereal Commodities

Industry had previously been advised of research that had commenced on ensuring clarity and consistency across commodities of the definition and method of assessment of Foreign Material (FM).

Since initiating the review the Committee has identified the need to consider a range of issues when developing recommendations. These issues included:

- Increased time for sample assessment of the FM content.
- Whether there are other implications and should the FM test be made a "mandatory" versus "voluntary" test.
- Extensive industry consultation is needed to reach agreement on FM definitions & levels to apply by commodity.
- Extensive discussions with traders and buyers (domestic/export) to explain all changes and reasons is required.
- The impacts of the change need to be considered across all States of Australia, for all end-use across all cereals.
- Industry views on the desire of the Committee to include the change across all Commodities given some commodity sectors may not desire such a change.
- Potential impacts of the change on all non-cereal commodities.

The Committee will continue to assess the issues and will provide its recommendations for action and industry comment during 2022.

4.6 Further Research: ANW2 – Wheat

Research has been conducted in recent seasons, and more particularly in 2021/22 into Dockage levels in premium Western Australian grades such as noodle wheat and APWN.

A Working Group has met on several occasions to discuss the relevant issues and to consider the findings. Based on the most recent data, the Committee has determined a Position Paper will be developed and provided to industry for comment with a view to:

- Outlining the issue in relation to the quality of grain supplied to customers.
- Discussing the outcome of the trials.
- Outlining various options to resolve the customer concerns
- Agree on finalising the matter via an agreed industry position.

5. Issues not approved for Future Consideration or Change

The following is a list of topics that have been considered by the Committee in relation to various aspects of the Trading Standards. The Committee has considered these and concluded they:

- Are a low priority.
- Do not require further attention at this time unless warranted.
- Where noted, are not approved for a change in Standards.

5.1 Not Approved: Sand, Soil and Earth Method of Analysis – All Cereal Commodities

There had been a call for a review of the method of assessment of these quality parameters with a view to make the assessment more consistent and practical than currently applied. The most significant issue reviewed was the potential to change measuring these parameters on a weight basis as compared to the existing counting method required for most commodities.

As the existing method is utilised where required and does not present any significant difficulties in general, the Committee agreed no further action is required at present.

5.2 No Change: Defect Tolerances SFW1 – Wheat

In 2020, a submission was received requesting that several defective grain quality parameters in the SFW1 Standard be altered (loosened) given that many of these quality parameters currently have limits closely aligned to milling grades. The reasoning was that SFW1 is used as a stockfeed grade.

It was noted that some sectors of industry apply variations as per the tolerances as requested to be altered based on seasonal conditions.

The changes proposed included:

| Quality Parameter | Existing SFW1 tolerance | Proposed change |
|--------------------|--------------------------|--------------------------|
| Stained | 15% by count | 50% by count |
| Field Fungi | 10 grains per half litre | 40 grains per half litre |
| Dry Green or Sappy | 10% by count | Unlimited |
| Severely Damaged | 1 grain per half litre | 5 grains per half litre |
| Insect Damaged | 2% by count | 4% by count |
| Over-dried Damaged | Nil | Unlimited |

Over the 2021/22 harvest, a significant tonnage of grain was received as SFW1 under the existing Standards. Those tolerances did not cause any significant issues for industry. The quality received under those Standards is currently being marketed and feedback indicates end-users are comfortable to receive grain under those specifications as per the quality received during the 2021/22 harvest.

Based on the premise that the existing Standards are suitable for use, the Committee has agreed that the proposed change is not warranted.

5.3 No Change: Moisture – Maize

A submission was received in 2021 seeking a reduction in the maximum moisture tolerance for maize from 14% to 13%. Several reasons for the proposed change were advised, with the main reason being the risk of quality deterioration during storage over the period required to store maize prior to outturn/receipt by the end-user.

The Committee reviewed the request and sought further feedback from the maize industry. Following consideration of feedback, the Committee determined that:

- This issue may be best dealt with through storage management practices.

- There is a range of educational material and industry experts to advise on the appropriate management of maize in storage under conditions where high moisture may be present.
- A reduction in the moisture limit would be detrimental to the grower's ability to harvest maize and deliver to their contractual specifications.

Based on the industry feedback no change will occur to the maize Standard for moisture.