



Date: 26 February 2021

To:
Agricultural and Veterinary Chemicals First Principles Review
Department of Agriculture, Water and the Environment
GPO Box 858
Canberra ACT 2601

Via on-line lodgement process

RE: Draft Report on Independent review of the agvet chemical regulatory system

To whom it may concern

I write in response to the draft report on the review of the agvet regulatory framework.

1. Organisations involved in this submission

This submission is presented on behalf of the following organisations:

Grain Trade Australia (GTA)

Grain Trade Australia (GTA) is a national association and is the focal point for the commercial grains industry within Australia. The role of GTA is to provide a framework across Industry to facilitate and promote the trade of grain. GTA facilitates trade and works to provide an efficient, equitable and open trading environment by providing leadership, advocacy and commercial support 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 Trading Standards and/or Trade Rules.

GTA has established the Australian Grains Industry Code of Practice. All GTA Members are required to adhere to the Code of Practice. GTA Members are drawn from all sectors of the grain value chain from production to domestic end users and exporters. GTA has over 260 organisations as Members. Their businesses range from regional family businesses to large national and international trading/storage and handling companies who are involved in grain trading activities, grain storage, processing grain for human consumption and stock feed milling. A list of GTA Members is attached.

The National Working Party on Grain Protection (NWPGP)

The NWPGP:

- Is the industry body responsible for providing management and leadership to industry in the areas of post-harvest storage, chemical use, market requirements and chemical regulations.
- Is facilitated by Grain Trade Australia.
- Has members across the entire grain supply chain.

- Hosts an annual forum providing participants with the latest research and developments, in the area of post-harvest storage and hygiene, chemical usage and outturn tolerances, international and domestic market requirements, and regulations.
- Co-ordinates and provides government with industry views on chemicals in use on grain and associated products.
- For further details, refer to <http://www.graintrade.org.au/nwpgp>

Within that context, GTA and the NWPGP provides the following submission in relation to the draft report on the review of the agvet chemicals regulatory system in Australia as it relates to grain.

2. General

In this submission, as per our submission on the initial first principles review document, comments are mainly focussed on the agvet chemical legislation and the impact of that regulation on the international trade of Australian grain, however comments in general equally apply to grain traded domestically within Australia.

Given the significant level of use of chemicals by the Australian farming sector, it is understood the issues paper uses language referring largely to the "Australian farmer". It should be recognised that agvet chemicals are used by stakeholders all along the grain supply chain, post the farm-gate.

This submission is in two sections:

- High level principles in the draft report that are supported, noting that comments are not provided on every issue and / or recommendation made in the draft report.
- Those high level principles in the draft report that are not supported.

3. Concepts outlined in the report - Supported

Several recommendations in the draft report are fully supported as outlined below. It does not include a list of all recommendations supported.

a) Changing Attitudes to Chemical Use

We agree with the draft report findings related to growing pressures from Australian consumers on pesticide use and residue testing data. Specifically, *"In the Panel's view, the necessary social licence to continue to use pesticides and veterinary medicines in Australia will ultimately be dependent on demonstrating that usage is responsible and safe, and that community concerns are being heard and taken into account in the operation of the regulatory system."*

Of concern is the omission from that statement and in the entire draft report is the failure to recognise some key considerations for chemical use. Chemical use not only impacts on the ability of grain producers, and subsequently the grain trade, to meet market MRLs (regulatory and / or contractual which frequently vary), but also the ability of the grain trade to supply that grain and meet:

- Customer quality requirements
- Customer and export market regulatory quarantine requirements for various pests, diseases and other contaminants

In many scenarios, without the judicious use of chemicals customer and / or regulatory requirements would not be able to be met resulting in a potential loss of market and thus value to the grain industry. Market quarantine requirements are in general becoming more restrictive, sometimes without scientific justification. It is in this environment that the marketing sector of the grain trade provide comments to the APVMA on proposals to register products in Australia (Trade Advice Notices) and the ability of the industry to maintain or gain new market access should those registrations proceed.

Any change in agvet chemical regulations must consider those aspects, and not just refer to aspects such as “the social licence” for use of chemicals.

The draft report states *“In short, the Panel is convinced that users of chemicals and chemical companies should not be complacent about their social licence to continue to use and supply pesticides and veterinary medicines. A regulatory system that listens and responds objectively to community concerns and maintains community trust in the use of these chemicals, is essential.”*

The grain supply chain does not take its social licence and legal obligations regarding all aspects of chemicals lightly. Industry systems to manage the complexities arising from chemical use and potential residues on grain to be marketed have been developed over many years to provide confidence in our industry. The draft report does not fully recognise those management systems that have been developed over time, often incurring significant expense to industry.

b) Recommendation 4 - Control of Use Arrangements

As noted in our initial submission, and in the draft report, the current control of use arrangements are not adequate. Harmonisation of arrangements across Australia are required in several areas under this topic.

When grain is exported, customers and regulators overseas do not discriminate regulatory arrangements depending on which State of Australia the grain was grown. The grain industry commonly refers to “Australia inc”, meaning that grain must meet domestic and overseas customer and regulatory requirements no matter where it was produced. Different regulations in different States makes that task more complex and difficult.

Of concern is recognition in the draft report in various areas, and in the wording in Recommendation 4 of *“The Panel recommends that the Australian Government work with states and territories, in the first instance, to implement a single national applied law approach to control-of-use regulation. This would be hosted by the Commonwealth and operate on the basis of full Commonwealth constitutional reach.”*

It is recognised that proposed approach will be difficult, if not impossible to fully implement in the short (to medium term), if ever. This is supported by the statement *“The Panel recognises, however, that attempts to harmonise control-of-use through the existing IGA have been largely unsuccessful”*.

The draft report assumes a national approach will be achieved and several recommendations are made based on that assumption, or failing that, a new IGA will be developed and agreed (e.g., Recommendation 5 & 6). While the recommendations for a national approach are well intended, given history in this task, and the difficulties of this approach being fully supported by all jurisdictions, the draft report must be modified in many areas to provide alternative recommendations should these Recommendations not be achieved in a relatively short timeframe. We suggest it may be more practical for the report to outline a timeline and phases to work towards a national approach outlined in Recommendations 5 & 6.

c) Recommendation 1 - Vision

The Panel recommends the following vision be adopted as the object of the legislation for the future pesticides and veterinary medicines regulatory system *“A trusted and nationally consistent regulatory system for pesticides and veterinary medicines that enhances and protects the health of humans, animals, plants, and ecosystems while improving access to safe products and uses, underpinned by 4 equally weighted objectives that would:*

- *safeguard animal health and welfare*
- *support primary industries*
- *protect Australia’s trade*
- *contribute to biosecurity preparedness.”*

While we support that vision, as noted in this submission, we do not believe the consideration of all aspects of the grain trade are sufficiently addressed under the various concepts proposed in the draft report. As outlined in the draft report, there are varying degrees of sophistication of chemical regulations including MRL adoption

overseas. The APVMA currently has a strong and recognised international reputation for its approach to registration of chemicals in Australia. Countries refer to the APVMA when developing or modifying their regulations. To assist exporting grain under the banner of “safe food”, that reputation must continue and be enhanced through the revised agvet regulations. The proposed changes in complexity of the regulatory system, by introduction of a Commissioner and greater access to chemicals as registered overseas, does not support that reputation. Further discussion occurs below.

d) Risk Based Approach

We fully support a risk-based approach to the regulatory system, not based on hazard alone.

Again, as outlined below, the proposed implementation of greater access to chemicals as registered overseas, does not necessarily support that concept without clear indications on the systems that regulators overseas manage. No details are provided in the draft report as to how that task will be managed.

e) Recommendation 51 Chemical Use Training

We fully support a national approach to *“.....all operators who apply chemicals in a commercial setting (be it agricultural or domestic) complete accredited education, training, competencies or other relevant qualifications in chemical use and application techniques, including handling, storage, risk assessment and management, end of life cycle disposal and recycling, regardless of whether the activity is subject to licensing”*.

Such a system will reduce variations in arrangements that chemical users must meet, potentially reducing the risk of errors when applying chemicals and meeting regulatory requirements, enhance user understanding and thus compliance and enhance the reputation of the national regulatory system.

f) Recommendation 97

We fully support access to chemicals in specific instances as outlined *“The Panel recommends establishing specific criteria to grant an emergency, research, or minor use exemption as long as a use would not jeopardise safety, efficacy, and trade.”*

We would again highlight that care is needed, with full consultation with relevant industry stakeholders, on developing those criteria. We must be clear that consultation on application of chemicals on grain, must be more extensive than producer organisations alone, and include those involved at various levels of the supply chain. Criteria currently are applied and there is a lack of details on what is proposed to enhance the current arrangements.

4. Concepts not Supported

The following outlines significant concerns we have with the draft report where recommendations are not supported.

a) Demands for better access to products and uses available overseas

It is recognised *“A lack of access to new products and existing product uses (available overseas) places Australian primary producers at a competitive disadvantage in comparison to their overseas counterparts”*. That concept also applies to other participants in the supply chain who use chemicals.

The draft report states *“While the Panel supports greater access, it is not proposing that all products available overseas should be available in Australia”*. Recognising some degree of explanation is included in the draft report, there are many aspects of this proposal that are not covered and require further consideration before this proposal is adopted. For example, how to effectively manage this chemical selection task. Therefore we do not support this principle based on the lack of detail provided and the potential risks to trade if this proposal was adopted.

The draft report outlines the key principles placing pressure on meeting customer MRLs and other regulations. Of concern is the draft report assumes that changes in chemical access for growers is required because of aspects such as decreasing MRLs, chemicals restrictions overseas and other country producers have access to more chemicals than Australian growers. While we recognise pest pressures, chemical resistance issues, changing environmental conditions among others are increasingly faced by Australian growers, that does not mean that the Australian regulatory system standards need to be compromised, or that chemical access should be increased to an equivalent level as that overseas.

The use of chemicals and trade in grain is a complex area. A potential significant increase in chemical availability in Australia, while assisting grain producers, will create a more complex trading environment, potentially leading to greater difficulties in meeting customer requirements and a lower return to industry (and ultimately growers). We believe the example given in other sectors where pre-qualified importers are granted responsibility to manage risks such as the Australian Trusted Trader is not applicable to grain as those stakeholders do not represent, or fully understand, the marketing risks and interests of the grain industry when grain treated with a chemical is traded.

We re-iterate that Australian grain growers are internationally competitive. That is reflected in the returns to grain growers and the value of the Australian grain industry, and highly regarded ability of the industry to meet market requirements. We do not support the statement *"The Panel is mindful of this emerging matter and its recommendations reiterate the importance to Australia's primary producers of having access to an equivalent suitable range of pesticides and veterinary medicines as in overseas markets if it is to remain competitive (particularly in light of pandemics like COVID-19),"* as that is too simplistic in terms of the complex nature of the marketing of grain overseas.

Recommendation 81 (or 85) does not provide sufficient detail on how an overseas regulator would be classified as *"equivalent"* to that in Australia other than *"a topic for discussion by the Stakeholder Forum"*. Again, the grain trade is particularly well placed to provide advice on the marketing impacts of those decisions but our sector is not proposed to be included in those discussions based on the proposal in the draft report. We believe the APVMA is unique and while some overseas regulators are renowned, we are unclear on the specific details as to how those overseas regulators would be selected. *"The Commissioner's equivalency assessment would also be informed by stakeholder consultation to include community and industry expectations. The Panel expects this consultation may form an early topic for consideration by the Stakeholder Forum"*. As noted previously there are concerns with that approach, given that chemical registration etc. should be risk based founded on science, not on concerns from one sector due to a different philosophical approach.

There is limited to no detail in the draft report on how specific Australian circumstances would be assessed and ultimately managed via regulation and/or industry quality management systems under the proposed adoption of overseas registrations. APVMA assess registration applications and produce product labels that include a range of information that many overseas regulators do not consider in that process (e.g., ESI). As noted in this submission, without adoption of these additional measures we believe that the proposal outlined in the draft report will ultimately undermine the reputation of the APVMA and consequently our grain exports.

It is noted *"The Panel heard from some stakeholders that, if access to the Australian market were to be linked with an overseas registration, it would be possible for future applicants to address any residual 'unique Australian issues' in the design and coverage of their overseas trials and applications. This would streamline the subsequent process for registration in Australia."* Further *"Licence holders will be required to make available to Australians all uses for a given chemical approved by the equivalent international regulator. The exceptions would be where the pest, disease, crop or animal is not present or endemic to Australia, or where there is an obligation for the licence holder to notify the Commissioner that the use in Australia would present risks to safety or trade that cannot be managed."*

We do not believe a chemical registrant would be able to undertake that risk assessment to the extent required as those activities are solely related to the commercial trade of grain and those stakeholders involved in that activity. Additionally as previously stated, the Commissioner, nor the proposed Stakeholder Forum, do not have the necessary skills to assess trade risks.

Again, this section of proposals in the draft report assumes *“the Commissioner will be best placed to issue and oversee licences given its responsibility for control-of-use under the single national law”*. As previously stated, there are concerns the goal of control of use under a single law will not be fully achieved.

We are concerned and strongly dispute the following claim on the basis there is no supporting information *“The proposed scheme should not generate trade concerns as major trading partners and major exporters are familiar with the use of licensing arrangements including the requirement for risk management plans for products”*. The example from the meat industry in this case is not relevant for grain. The statement is also not reflective of the current regulatory environment where overseas regulators adopt MRLs that may be lower than Australian or international MRLs, despite being fully cognisant of licensing arrangements.

b) Commissioner for Pesticides and Veterinary Medicines Stewardship

Noting the concept of greater transparency in regulatory arrangements is supported, we do not support the proposed arrangement for creation of a Commissioner to *“oversee all aspects of the regulatory function”*.

There is a lack of specific detail in the draft report outlining the arrangements for this Commissioner to operate. Despite wording in the draft report to the contrary, on reading the many areas of proposed operation of the Commissioner and Board it could be concluded this additional role is a duplication of many of the current APVMA roles. It also introduces a more complex arrangement to the management of chemicals, noting that the current arrangements of APVMA MRLs and FSANZ MRLs are an example where significant advocacy is required to ensure understanding by industry. For example:

- How the Commissioner will *“act as a key liaison point for stakeholders and governments through formal consultation mechanisms”* given current consultation mechanisms of the APVMA.
- As noted above, the draft report assumes control of use regulations will be achieved *“Rather, when established in conjunction with the single national law, there will be a reduction in the number of regulators and policy makers in the current system”*. To the contrary, we see the strong potential exists for an additional layer.
- While the draft report states there will be clear responsibilities between the APVMA and Commissioner, there is not sufficient detail to support that proposal.
- Currently the APVMA fully supports industry advocacy efforts domestically and internationally. Adding another section, being the Commissioner, will add complexity in terms of explaining the *“different roles”* to our customers and overseas regulators.
- We cannot see the benefit and thus cannot agree with the following statement due to the lack of detail. Our direct industry experience has been that the current arrangements are clearly understood by our overseas customers and regulators, who rely on the expertise of the APVMA for guidance and direction *“With the benefit of advice from the APVMA and other relevant agencies, the Commissioner will also take leading roles in domestic and international policy discussions, complementing and cooperating with the APVMA’s leading roles in technical and scientific fora, such as the Codex. The Panel expects that it is these dual leadership roles, reflecting the separate areas of expertise between the Commissioner and APVMA, that will act as the primary source of information and knowledge sharing.”*
- Recommendation 8 *“The Panel recommends that the Commissioner will have responsibility for control-of-use functions including associated licensing activities”*. It is unclear how this will operate for example when Trade Advice Notices are released and industry views of the trade impacts of a registration are sought – for example will we need to respond to the Commissioner or APVMA.

We urge a review of this proposed Commissioner concept, with alternatives explored. An alternative would be to keep the current APVMA arrangements and create a regulatory oversight function of the current APVMA activities to manage the various aspects outlined in the draft report where there are current deficiencies.

c) Recommendation 14 - Stakeholder Forum

“The Stakeholder Forum would establish a channel for dialogue between stakeholders to provide input to the development of policies across the whole regulatory system relating to pesticide and veterinary medicines. The Stakeholder Forum would have broad based membership reflecting the range of interests in pesticide and veterinary medicine product use and impacts. The Panel expects representation would include farming, environmental, animal welfare, consumer and health groups, chemical companies, veterinarians, chemical applicators, trade unions, education, and training organisations and relevant government agencies”.

Given the impacts of chemical use on the grain trade, and the significant level of communication the grain trade has with customers and regulators both domestically and overseas, it is very disappointing, and raises questions as to the Panel’s understanding, that no supply chain and end-user sector is proposed to be represented.

Similarly, Recommendation 16 *“The Panel recommends that the Commissioner establish a set of comprehensive performance measures that cover the entire regulatory system”* does not include reference to measuring the impacts on the trade of grain.

While we support further meaningful consultation, we do not support the proposed stakeholder Forum in its proposed form.

d) Surveillance System (Recommendation 19 to 21) & Residue Data Monitoring & Generation

Without further detail it is unclear how development and ongoing review of a residue surveillance system will operate given government (and industry) already has a number of mechanisms to monitor aspects such as *“decisions by overseas regulators”*. For example, the National Residue Survey (NRS) currently effectively undertakes that task with close liaison with the grain trading sector. APVMA are also consulted as required. That system works well and is widely utilised by industry (and Government) in promoting industry compliance with chemical regulations. The draft report does not adequately explain the failures of that system.

Through the NRS, residue data on individual grain shipments is not provided publicly but only to the storage agent loading the vessel and the marketer. No details in the draft report are provided on the level of data to be made available because of the proposed approach and how commercial in confidence information can be managed to not compromise Australia’s reputation of providing grain that meets importing country and customer requirements. Until that detail is provided, we cannot support the surveillance proposal as cited in the draft report given the potential negative implications on the grain trade.

Additionally, Recommendation 21 *“The Panel recommends the Commissioner consider how to best utilise and capitalise on current record keeping requirements for use of pesticides and veterinary medicines in Australia”* places a significant responsibility on the Commissioner who may not be fully aware of the impacts of using that data. Several other Recommendations related to *“residue monitoring results of domestic produce”* are also applicable to our concerns in this regard. As noted previously, as grain traders (marketers) are not proposed to be on the Stakeholder Forum, the potential exists for collation and release of data that may compromise industry efforts in promoting the quality of our grain products on the domestic market. As issues identified on the domestic market also impact the export market, domestic surveillance and residue monitoring on the domestic market cannot be done in isolation of the export market.

e) Recommendation 82 Prohibited Chemicals

As noted previously the Stakeholder Forum as proposed contains several non-scientific stakeholders. We believe a chemical should be selected to be on a prohibited list based on science based technical evaluation only, such as toxicity based on usage patterns, dietary exposure risks among other others. A regulator with expertise such as APVMA should be responsible for development of that list and not be beholden to a Stakeholder Forum that may attempt to introduce other reasons for prohibiting a chemical.

Thank you for your consideration of this submission.

A handwritten signature in black ink, appearing to read 'G McMullen', written in a cursive style.

Gerard McMullen
Chair, National Working Party on Grain Protection, on behalf of Grain Trade Australia



Membership List as at 1 March 2021

Organisation	Contact	Website /Phone
Ordinary Member (Trading)		
Level A1 (over 7 Million Tonnes)		
CBH Grain Pty Ltd	Mr Jason Craig	cbh.com.au
Glencore Agriculture Pty Ltd	Mr Philip Hughes	glencoreagriculture.com.au 2
Level A2 (5 - 7 Million Tonnes)		
Graincorp Operations Ltd	Mr Robert Spurway	graincorp.com.au 1
Level A3 (3 - 5 Million Tonnes)		
ADM Trading Australia Pty Ltd	Mr Darryl Borlase	adm.com
Cargill Australia Limited	Mr Erik Wibholm	cargill.com.au 2
Level A4 (1.5 - 3 Million Tonnes)		
Level B1 (1.0 - 1.5 Million Tonnes)		
Emerald Grain Pty Limited	Mr David Johnson	emeraldgrain.com
Cofco International	Ms Sara Pan	cofcoagri.com.au 2
Level B2 (500,000 - 1 Million Tonnes)		
Arrow Commodities Pty Ltd	Mr Dominic Vanzella	arrowcom.com.au
Australian Grain Export Pty Ltd	Mr Brett Dodson	australiangrainexport.com.au
Barrett Burston Malting Co Pty Ltd	Mr Dean Ganino	www.bb malt.com.au
CHS Broadbent Pty Ltd	Mr Steve Broadbent	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 Mark Lewis	riordangrains.com.au
Riverina (Australia) Pty Ltd	Mr Gareth Stapleton	riverina.com.au
Bunge Agribusiness Australia Pty Ltd	Mr Stephen Bennett	bunge.com/agribusiness 10
Level B3 (250,000 - 500,000 Tonnes)		
Allied Pinnacle Pty Ltd	Mr Josh Lawrence	alliedpinnacle.com
Robinson Grain Trading Co Pty Ltd	Mr Gary Robinson	robinsongrain.com.au
Wilmar Gavilon Pty Ltd	Mr Matt Albion	07 3713 8700
Louis Dreyfus Company Australia Pty Ltd	Mr Sam Roache	louisdreyfus.com.au
Quadra Commodities Pty Ltd	Mr Robin Cassar	quadra.com 5
Level C1 (over 10 employees, under 250,000 Tonnes)		
Adams Australia Pty Ltd	Mr Ian Mack	adamsaustralia.com.au
Agriex Australia Pty Ltd	Mr Joseph Khnessier	02 9232 0690
Agri Management Pty Ltd	Mr Brett Stevenson	02 9499 4199
AGT Foods Australia	Mr Michael Brittain	agtfoods.com/australia
Associated Grain t/a Agrocrop Processing Australia	Mr Bhuvan Gandhi	07 4662 1999
Auscott Ltd	Mr Peter Webb	auscott.com.au
Australian Fresh Milk Holdings (AFMH)	Ms Jill Smith	02 6344 8462
BFB Pty Ltd	Mr Shane Bird	bf.com.au
Blairs Produce Company	Mr Sean Blair	02 6025 4600
Boolah Farms Pty Ltd	Mr Stuart Tighe	02 6754 0343
Castlegate James Australasia Pty Ltd	Mr Ross Giovanetti	castlegatejames.com.au
Coprice	Ms Krissy Campbell	coprice.com.au
Darwalla Milling Co Pty Ltd	Mr Gary Heidenreich	07 3822 0527
Deacon Seeds Company	Mr Mark Schmidt	07 4662 3217
Deckert Group Pty Ltd	Mr Chris Deckert	deckerts.com.au
Esperance Quality Grains	Mr Neil Wandel	members.westnet.com.au/eqg
Five Star Stock Feeds	Mr Tim Huggins	fssf.com.au
Fletcher International Exports Pty Ltd	Mr Kurt Wilkinson	fletchint.com.au
Hanlon Enterprises Grain	Mr Chris Coates	hanlonenterprise.com.au
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
James Stock Feed and Fertilizer Pty Ltd	Mr Adrian Moule	jamesstockfeed.com.au
Jerilderie Grain Storage & Handling	Mr David Barlow	03 5886 0344
K M & W M Kelly & Sons	Mr Matt Kelly	kellygrains.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
MC Croker Pty Limited	Mr Greg Carroll	crokergrain.com.au
MSM Milling Pty Ltd	Mr Peter MacSmith	02 6364 5999
Namoi Cotton Ltd	Mr Shane McGregor	namoicotton.com.au
Newcastle Agri Terminal Pty Ltd	Mr Jock Carter	02 4962 4006
Premium Grain Handlers P/L	Mr John Orr	pgh.com.au
Quattro Ports	Mr Dave Allen	quattroports.com.au
Reid Stockfeeds Pty Ltd	Mr Ian Reid	reidstockfeeds.com.au
Rivalea (Australia) Pty Ltd - Animal Nutrition	Mr Andrew Philpotts	rivalea.com.au
Riverina Oils & BioEnergy Pty Ltd	Mr Lachlan Herbert	riverinaoils.com
Southern Cotton Trading Pty Ltd	Mr Chris Veness	02 69 552 779
SunPork Farms Feed Mills	Mr Mark Young	08 8532 4434
Tasmanian Agricultural Producers Pty Ltd	Mr David Skipper	tasagproducers.com.au
ThriveAgri	Mr Charlie Brown	thriveagri.com
TSS Grain (Tasmanian Stockfeed Services)	Mr Trevor Macleod	tasstockfeed.com.au
Unigrain Pty Ltd	Mr Ervin Leong	unigrain.com.au
W B Hunter Pty Ltd	Mr Stewart Coombes	03 5821 5744
Wilken Grain	Mr Richard Wilken	wilkens.com.au
Woods Grain Pty Ltd	Mr Bruce Woods	woodsgroup.com.au
XLD Commodities	Mr Lachie Stevens	xldgrain.com.au
Yenda Prods Grain Pty Ltd	Mr Luke Mancini	0437 512 322

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Level C2 (under 10 employees, 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
Advantage Grain Pty Ltd	Mr Chris Nikolaou	www.advantagegrain.com.au
Access Grain Pty Ltd	Mr Wade Humphreys	accessgrain.com.au
Agmark Commodities	Mr Richard Alcorn	agmark.com.au
Agracom Pty Ltd	Mr Joe Hallman	agracom.com.au
Agri Om Australia Pty Ltd	Mr Kishore Bulchandani	agriom.com.au
Agri-Oz Exports Pty Ltd	Mr Francois Darcas	03 9830 7021
AgriGrain	Mr Jeremy Brown	agriGrain.com
Agromin Australia Pty Limited	Mr Rajni Patel	agromin.com.au
Marina Commodities	Mr Palvinder Singh	marinacommodities.com
Australian - Asian Agricultural Exports Pty Ltd	Mr Mick Connolly	aaax.ws
Australian Choice Exports Pty Ltd	Mr James Hunt	australianchoiceexports.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
Baker Grain	Mr Richard Baker	bakergrain.com.au
Boort Grain Co-Operative	Mr Jon Bucknall	02 9875 3919
Broun and Co Grain Pty Ltd	Mr Wal Broun	brounandco.com.au
Cameron Pastoral Company Pty Ltd	Mr Ken Cameron	07 4671 4144
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
Chester Commodities Pty Ltd	Mr Richard Black	chestercommodities.com.au
CL Commodities Pty Ltd	Mr Robert Lean	clcommodities.com.au
Continental Grain Handling Pty Ltd (CGH)	Mr Rick Guo	08 6333 1068
Coorow Seeds	Mr Brian Pover	coorowseeds.com.au
Cory Johnston (Aust) Pty Ltd	Mr Justin Fay	coryjohnston.com.au
Craig Tyack Grain Trading	Mr Craig Tyack	0428 729 167
Demeter Cormack Pty Ltd	Mr David Oates	08 6389 0098
Defiance Maize Products Pty Ltd	Mr Rodney Walker	corson.co.nz
Direct Grain Pty Ltd	Mr Mark Davis	https://directgrain.com.au/
Direct Commodities Pty Ltd	Mr Hamish Robertson	directcommodities.com.au

Donnellons Bulk Haulage Pty Ltd	Mr Bill Donnellon	0428 136 483
East Coast Stockfeed Pty Ltd		ecsf.com.au
Ellerslie Free Range Farms Pty Ltd		07 4695 5777
ETG Commodities Pty Ltd	Mr Peter McMeekin	peter.mcmeekin@etgworld.com
Export Trading Group Australia Pty Ltd	Mr Shayne Clark	etgworld.com
Feed Central Pty Ltd	Mr Tim Ford	feedcentral.com.au
Findlays Barellan	Mr Neil Findlay	02 6963 9246
Grenfell Commodities Pty Ltd	Mr Glenn Beasley	grenfell.com.au
GO Resources Pty Ltd	Ms Rosemary Richards	go-resources.com.au
Gold Star International Pty Ltd	Abhishek Kotkar	goldstarinternational.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
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
Harwood Grains Pty Ltd	Mr Paul Harwood	harwoodgrains.com.au
Hutt & Co Pty Ltd T/A GrainSource	Mr Simon Hutt	grainsource.com.au
J W Koek & Company	Mr Brian Algate	07 3341 4548
KB Agri Services Pty Ltd	Mr Karl Bliss	07 4634 4320
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
Lemarc Agromond Pty Ltd	Mr Michael Aikman	lemarcagromond.com
Mandala Trading Pty Ltd	Mr Jayjeev Saraff	mandalatrading.com.au
McKenzie Ag Services	Mr Lachlan McKenzie	mckenzieag.com.au
McNaughts Grains & Fertilizer Pty Ltd	Mr Daniel McNaught	www.mcnaughts.com
Matthews Transport and Grain Traders	Mr Neville Matthews	08 9831 1021
Max Grains Pty Ltd	Mr Jack Fahy	maxgrains.com.au
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
Nandaly Grain Co-Operative Ltd	Mr Tony Bellinger	03 5078 1217
Network Grains Pty Ltd	Mr Craig Dennis	07 4637 8500
ETG Processing Pty Ltd T/A Wimpak	Mr James French	wimpak.com.au
Origin Grain Pty Ltd	Mr Peter Brick	03 5720 8500
Pacific Global Sprouts Pty Ltd	Mr Prashant Kewlani	pacificglobalsprouts.com
Parkinson Bros	Mr Rohan Parkinson	parkinsonbros.com.au
PB Seeds Pty Ltd	Mr Peter Blair	pbseeds.com.au
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
Plum Grove Pty Ltd	Ms Rikki Foss	plumgrove.com.au
Preston Grain	Mr Andrew Kell	02 6977 1733
Pure Foods Eggs Pty Ltd	Mr Tim Castle	www.purefoods.com.au
Quirindi Grain & Produce	Mr John Webster	02 6746 1911
Rhodium Trading Australia Pty Ltd	Mr Mark Fitzgerald	rhodiumresources.com
RP Grain Pty Ltd	Mr Gordon Pulham	rpgrain.com.au
RT Wallace Pty Ltd	Mr Reilly Wallace	wallacebulkhaulage.com.au
Ruddenkluu Grain Pty Ltd	Mr Tim Ruddenkluu	08 8842 1314
Rural Logic (Aust) Pty Ltd	Mr Michael Wood	rurallogic.com.au
Shannon Bros Bulk Storage Pty Ltd	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 Cross Agricultural Exports P/L	Mr Syd Parsons	southerncrossag.com.au
Spagrimon Australia Pty Limited	Mr Jiger Kotecha	spagrimon.com.au
Standard Commodities Australia Pty Ltd	Ms Elizabeth Bozinoska	stancom.com.au
Sudima Australia Pty Ltd	Mr Jim Garvey	sudima.com
Summer Hill Grains	Mr Barney Hughes	0428 694 363
Surat Bulk Grains	Ms Fay Donoghue	0428 265 425
Southern Grain Pty Ltd	Mr Tim Gross	www.southernstockfeeds.com.au

Southern Grain Storage Pty Ltd	Mr Campbell Brumby	03 5267 2351
Swiss Singapore (Australia) Pty Ltd	Surya Jain	swiss-singapore.com
Tamma Grains Australia Pty Ltd	Ms Kim Packer	0428 887 026
Thallon Grains Pty Ltd	Mr Andrew Earle	02 6756 5004
Ulusoy Asia Pacific	Mr Mark Madjarevic	ulusoyflour.com
Unique Grain Management Pty Ltd	Mr Mark Thiele	uniquegrain.com.au
Universal Commodity Management	Mr Tim Dean	commoditymanagement.com.au
Ward McKenzie Pty Ltd	Mr Geoff Hammon	mckenziefoods.com.au
Watershed Commodities	Mr Jack Vivers	0427 715 543
Watson's Bulk Logistics	Mr Joel Watson	wbl.net.au
WHG Oceania Pty Ltd	Mr Gesheng Shen	02 8040 3030
WW Agri Pty Ltd	Mr Steve Sloss	wwagri.com.au

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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
Horne Ag Logistics Pty Ltd	Mr Jeremy Horne	www.horneaglogistics.com.au
Pacific National (NSW) Pty Ltd	Mr Hugh Cox	pacificnational.com.au
SEAWAY Intermodal Pty Ltd	Mr Bikash Ram	seawayintermodal.com.au

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Broker

Large

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Medium

Agriboard Pty Ltd	Ms. Angela Hawke	www.agriboard.online
Fox Commodities Pty Ltd	Mr Paul Cochrane	foxcommodities.com.au
Grain Brokers Australia	Mr Jeff Winspear	grainbrokers.com.au
Horizon Grain Brokers Pty Ltd	Mr Ash Munro	horizongb.com.au
iGrain.com.au Pty Ltd	Ms Emily Fleming	igrain.com.au
StoneX Financial Pty Ltd	Mr Stefan Meyer	intlfcstone.com
McDonald Pelz Australia	Mr Peter Geary	mcdonaldpelz.com
Perkins Commodity Brokers	Mr Craig Perkins	03 9645 6846
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
Allied Grain Pty Ltd	Mr Angus Wettenhall	alliedgrain.com.au
Cogeser (Australia) Pty Ltd	Mr Robert Luetolf	cogeser.com.au
Esquire Commodities Pty Limited	Mr Rowan Relton	07 4635 7215
Farm Tender	Mr Matt Henke	farmtender.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 Ian Waddell	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

AgriDigital	Mr Henry McKay	agridigital.io
AgriFood Technology Pty Ltd	#REF!	03 9742 0589
Amspec Australia Pty Ltd	Mr Lee Shilvoek	amspecgroup.com
Australian Superintendence Company	Mr Andrew Parry	07 3391 8640
Commodity Inspection Services (Australia) Pty Ltd	Ms Katrina Saunderson	commodityinspection.com.au
Foss Pacific Pty Ltd	Mr Phil Soderberg	foss.com.au
Holding Redlich	Mr Geoff Farnsworth	holdingredlich.com
Holman Fenwick Willan	Mr Stephen Thompson	hfw.com
Intertek	Mr Ben Jones	intertek.com
SBA Law	Mr Jeremy Rosenthal	sbalaw.com
SGS Australia Pty Ltd	Mr Scot Paterson	au.sgs.com
T-Ports Pty Ltd	Mr Kieran Carvill	tports.com
Viridis Ag	Mr Anthony Howard	viridisag.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
Aperture Ag Pty Ltd	Mr Alex Campbell	0450 201 103
Basis Commodities Pty Ltd	Mr Chris Whitwell	basiscommodities.com.au
BSM Global Pty Ltd	Mr Robert Fleming	buysellmove.com
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
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
Graintec Scientific Pty Ltd	Mr Lucas Anstiss	graintec.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 Ole Houe	ikoncommodities.com.au
Lachstock Consulting Pty Ltd	Mr Nick Carracher	lachstockconsulting.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
Merricks Capital Services Pty Ltd	Mr Adam Davies	merrickscapital.com
Mirfak P/L	Mr Mark Murphy	mirfak.com.au
National Grower Register Pty Ltd	Ms Debbie Newmarch	ngr.com.au
OMIC Australia Pty Ltd	Mr Yasuhide Okumura	omicaustralia.com.au
Perten Instruments Australia Pty Ltd	Mr Raul Ovelar	02 9870 3400
Planfarm Marketing Pty Ltd	Mr Jerome Critch	planfarm.com.au
Priag Marketing Pty Limited	Mr Kevin Schwager	www.priag.com.au
Primal Foods Group	Mr Peter Longhurst	primalfoodsgroup.com
Profarmer Australia Pty Ltd	Ms Hannah Janson	australiancropforecasters.com.au
Rise Agribusiness Pty Ltd	Mr Ian Dalglish	riseagri.com.au
Rural Directions Pty Ltd	Mr Chris Heinjus	ruraldirections.com
Saputo Dairy Australia Pty Ltd	Mr Robert Ford	1300 643 333
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
TT Club Mutual Insurance	Mr Rhys Richards	www.ttclub.com
Wattletree Consulting Pty Ltd	Mr Jon Bucknall	

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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	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	Ms Alexandra Bunton	02 9478 1000

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Merchant Association

Grain Industry Association of SA	Mr Ben Noll	+61 8 8361 5601
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		Awarded 1998
Mr Christopher Kelly		Awarded July 2015
Mr Geoff Honey		Awarded July 2016
Mr Terry Deacon		Awarded August 2019

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