

30th November 2021

Department of Agriculture, Water & the Environment
GPO Box 858
Canberra ACT 2601
Email: Via Web

Re: Submission: Export Control; Rules 2021 – Proposed Amendments

Dear Sir/Madam,

Thank you for the opportunity for Grain Trade Australia (GTA) to provide feedback on the proposed amendments to the Export Control Rules 2021 (the Rules). This is a further opportunity as it follows numerous meetings, consultation and dialogue offered by the Department of Agriculture, Water and the Environment (DAWE) during industry / government meetings which GTA participates in.

Grain Trade Australia (GTA) is a member of a Department of Agriculture Grain and Plant Products Export Industry Consultative Committee (GPPEICC). GTA is the focal point for the commercial grain 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 is non-political, industry driven with a primary focus to ensure the efficient facilitation of commercial activities across the grain supply chain including a strong focus on the logistics of grain through transport storage and ports.

GTA's has over 270 organisations as members ranging from regional family businesses to large national and international trading, storage and handling companies, grain marketers, consumers, and processors. The vast majority of grain contracts executed in Australia refer to GTA grain trading standards, standard-form grain contracts and GTA Trade Rules. Most of Australia's grain storage and freight movements are made by GTA members. Key national and state producer representative groups are also GTA Members. A list of GTA Members is attached.

1. Value of Australian Export Regulations

The grain industry has a reputation as a reliable supplier of quality grain on the international market. This reputation is supported and enhanced by the export regulations as managed by DAWE to ensure grain meets importing country quarantine requirements. GTA supports those regulations and would not support any major changes arising from the current legislation review.

2. GTA Feedback on the Changes to the Rules

GTA is supportive of the changes as outlined in the information provided and again thank DAWE for consulting during meetings on these proposed changes. However, GTA would like to comment and provide feedback on two matters that are still being implemented.

2.1 Bulk Vessel Approvals

GTA has been involved in the implementation phase of the introduction of regulation that Authorised Officers carrying out bulk vessel inspections must make a video recording of each inspection and has given its feedback throughout the process. GTA noted during the design phase that DAWE has not provided detailed guidance material and direction to ensure a specific standard of video capture is provided by the Authorised Officers. It is understood this guidance is being developed and will be made available. GTA requests a review of this material in order to highlight any issues that may need further consideration before the change is made. GTA will continue to provide feedback and assistance to DAWE to ensure this procedural change is implemented to the benefit of industry.

2.2 Accredited Marine Surveyors

This amendment to introduce a revised system of accreditation for qualified marine surveyors is still being progressed.

Whilst GTA **is supportive of the changes** to ensure all qualified marine surveyors are accredited under the Accredited Grain Surveyor Assurance (AGSA) Scheme by the Australasian Institute of Marine Surveyors (AIMS) to survey and certify bulk vessels for plant product exports the **implementation has caused some concern.**

GTA welcomes that DAWE will work closely with AIMS, marine surveyors and industry to ensure that the specific accreditation mechanisms and requirements are **clear and agreed** before the commencement of this provision as there has been concerns this change may limit the capacity of the number of surveyors to inspect grain vessels. Further consultations with stakeholders by DAWE and AIMS will benefit this change before implementation.

3. In Summary

GTA is supportive of the changes as they are outlined and will continue to engage with DAWE to ensure the smooth implementation of the items raised in 2.1 and 2.2.

Thank you for this opportunity to comment. Please do not hesitate to contact GTA at any stage to discuss further.

Yours faithfully,



Pat O'Shannassy
CEO, Grain Trade Australia