

23 February 2023

National Agricultural Traceability
Department of Agriculture Forestry and Fisheries
GPO Box 858
Canberra City ACT 2601

Email: nationaltraceabilitysummit@agriculture.gov.au

Dear Sir/Madam

RE: Draft National Agricultural Traceability Strategy Draft Implementation Plan

1. About Grain Trade Australia

Grain Trade Australia (GTA) is a national member association and is the focal point for the commercial grain industry within Australia.

GTA has over 270 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, grain marketing advisory services, processing grain for human consumption and stock feed milling. GTA Members are substantial employers, from the farm gate through to end point consumption, and notably in rural and regional Australia. A full list of GTA Members can be found [here](#).

GTA's core focus is to 'facilitate trade' in the Australian grain industry. Its products and services, including the Australia Grain Industry Code of Practice, provides a self-regulatory framework across the grain industry to facilitate and promote the trade of grain within the Australian grain value chain.

Within this context, on behalf of its members, GTA provides comment on the Draft National Agricultural Traceability Strategy.

2. General Comments on the Draft National Agricultural Strategy.

Thank you for providing an opportunity to make comment on the draft Implementation Plan.

As discussed in previous submissions in the grain industry management of product quality and food safety is a process of quality assurance where risks are analysed, and process controls through the supply chain are employed to minimise risks as much as practically possible. The Australian grain industry Quality Assurance process has a strong focus on the assessment and discovery of any grain quality issues prior to the product being consigned to the domestic or export customer.

It is important to note Traceability is a support function within the Quality Assurance process and is a component of exporting grain to meet the Export Control Act. Similarly, GTA considers advances in the digitisation and interoperability of Traceability are about staying 'in the game' rather than opening up new markets, creating value-add opportunities or solving 'world peace'.

3. Specific Comments on the Draft National Agricultural Traceability Draft Implementation Plan Strategy

The initial review of the draft plan indicates:

1. The **Pressing Challenges** need to be toned down into **plain language such as**:
 1. Align international and national data standards and Australian government frameworks.
 - i. Align government regulatory requirements to support (1)
 2. Engage with industry to improve adoption of Traceability.
 - i. Development a funding mechanism to support (2).

2. While there is a lot of project jargon in the draft there is little detail and is missing steps, baselines, targets, meaningful milestones to the extent this draft plan reads more like an **extension of the draft strategy document** rather than a plan that can be understood and executed.
3. Overall, the drafting of this document and the strategy it supports is challenging for its audience. You should be aware the grain industry, is made up of people who are time-poor and as a result pragmatic. The project language and jargon speak (e.g. *'horizon scan emerging trends'*) is unnecessary. GTA suggest this could be simplified as the actual key steps in the strategy are relatively clear and simple being:
 1. Align international and national data standards and Australian government frameworks.
 2. Engage with industry to improve adoption of Traceability.
4. There is also unnecessary commentary on 'market access' and 'value add' opportunities including mutually beneficial outcomes with Asia Pacific partners. These activities are part of the normal and ongoing activities of industry and government and should not be included in this document as an area for action for the project.

Conclusion

GTA welcomes the opportunity offered by DAFF to provide comment on the draft National Agricultural Traceability Strategy Draft Implementation Plan. This draft plan requires further consideration and should include more detailed actions with less jargon.

Given the Draft National Agricultural Traceability Strategy is still under review and is expected to be completed in mid-2023 there is opportunity to improve this draft Implementation Plan.

I look forward to the progress of this Implementation Plan and further opportunities to engage and provide input.

Thank you for your consideration of this response.



Pat O'Shannassy
Chief Executive Officer