

17 March 2021

Gene Technology Implementation  
Department of Health  
GPO Box 9848  
CANBERRA ACT 2601  
[Gene.technology.implementation@health.gov.au](mailto:Gene.technology.implementation@health.gov.au)

## **Re: Consultation Regulation Impact Statement**

### **1. Introduction**

Grain Trade Australia (GTA) appreciates the opportunity to provide this submission to the Consultation Regulatory Impact Statement (CRIS) on the National Gene Technology Scheme (Scheme).

As indicated in previous submissions to the Review of the Scheme, GTA supports a regulatory system that is science based and commensurate to risk.

Gene technology is an important issue for the grain industry and GTA has been actively involved in industry discussions on this issue globally via membership of the International Grain Trade Coalition (IGTC) and domestically via the GTA technical committee on Plant Breeding Innovation that brings together representatives from across the Australian grain and seed value chain.

As highlighted in previous submissions to this review, a major challenge for the grain trade is the lack of consistency in regulations regarding gene technology regulation globally. GTA works with the global grain industry to try and achieve global harmonisation in the approach to regulation and encourage adoption of a similar approach across jurisdictions leading to legal certainty as this will provide for the lowest chance of trade disruptions. Alignment and regulatory coherence will assist governments to avoid unnecessarily eroding the value of the innovation and/or driving up costs and complexity in the global food system.

### **2. About GTA**

Grain Trade Australia (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 members (see attached list) 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 standards and/or trade rules.

GTA members are drawn from all sectors of the grain value chain from production to domestic end users and exporters. GTA members are involved in grain trading activities, grain storage, grain for human consumption and stock feed milling.

Thus, this submission is made within this context and focuses on the options in the CRIS from a facilitation of trade perspective. As such, GTA's submission focuses on the options to improve the Scheme in a manner that science and risk based and does not provide detailed comments on the operational aspects of Scheme.

### 3. GTA supports Option B

GTA prefers **Option B: Risk-tiering model** as this most closely aligns to GTA's support for a risk based system and will assist to move the Scheme to a principles-based regulatory system providing flexibility and opportunity for administrative efficiency. Option B provides the opportunity to streamline the regulation of 'traditional' gene technology in a way that is more proportionate to the risk profile of well understood and characterized organisms and traits. This approach will continue to support Australia's reputation for its regulatory framework associated with gene technology.

GTA believes that it is critical that the Scheme is also able to deal with innovations in gene technology. We note that Option B may not adequately address the different risk indicators presented by innovations in gene technology, in particular, those innovations which present a risk profile comparable to that of conventional breeding. It is expected that plant breeding innovations technologies will be increasingly utilised in the future and it is important the Scheme can appropriately deal with products from these technologies in a manner that does not adversely impact on trade. The CRIS does not adequately address how new and emerging technologies would be considered under Option B.

### 4. Definitions

GTA agrees that there is a lack of clarity regarding what the current definition **gene technology** captures. GTA supports definitions that are based on science or global consensus. As such, GTA does not believe that the word 'creation' in the example definition of 'gene technology' is appropriate. Further, the current and proposed changes to the definition lacks consistency with other regulators in Australia (e.g., FSANZ) and lacks harmonisation with other international biosafety regulatory systems.

As for the proposed definition of 'gene technology', GTA does not support the insertion of the words 'or created' in the proposed definition of '**genetically modified organism**' as this does not align with a science/risk-based system. Over the past 20 years the Scheme has effectively captured and regulated GMOs that have been 'created/generated/developed' through the currently defined process of gene technology.

Other definitions around '**dealings**' and '**pathways**' are more operational issues and GTA is supportive of proposed changes where they remove ambiguity, assist in futureproofing the Scheme, and do not pose any unintended additional regulatory burden due to flow on impacts from other regulatory agencies and legislation. GTA believes that the users (technology/research/seed sectors) are best placed to provide advice on these definitions. Similarly, details relating to licenced dealings and permits are best addressed by the users of the Scheme, however, GTA is supports proposals around a tiered approach based on the level of risk with associated streamlining for lower risk dealings.

GTA notes that it is somewhat unclear in the CRIS as to whether public consultation would remain in relation to licenced dealings, and how this might be reflected in each of the risk tiers. GTA supports the maintenance of public consultation as it is essential in ensuring public confidence in the risk assessment process.

### 5. International Regulatory Harmonisation

GTA supports any amendments and activities that assist to achieve international regulatory harmonisation and encourages the Government to maintain a close involvement with international partners in the regulatory environment and global initiatives.

A major challenge for the global grain trade is the lack of consistency in regulations regarding gene technology regulation globally. GTA supports the harmonisation of regulation and encourages Australia to remain involved in international forums on gene technology related issues including Cartagena biosafety protocol, low level presence, regulation of new technologies and other similar initiatives.

GTA works with the IGTC to try and achieve global harmonisation in the approach to regulating such activities. The main aim of IGTC efforts is to achieve international alignment, i.e. adoption of a similar approach across jurisdictions leading to legal certainty as this will provide for the lowest chance of trade disruptions. Alignment and regulatory coherence will assist governments to avoid unnecessarily eroding the value of the innovation and/or driving up costs and complexity in the global food system.

In 2018, the Australian Government endorsed the WTO 'International Statement on Agricultural Applications of Precision Biotechnology'. Included in this statement was a commitment that "due consideration should be given by governments to avoid arbitrary and unjustifiable distinctions between end-products derived from precision biotechnology and similar end-products that are obtained through other production methods."<sup>1</sup> This commitment is supportive of modernising and future-proofing the Scheme.

Thus, GTA supports Option B as a mechanism to modernise the Scheme but notes that further engagement is required to determine the risk indicators for the proposed tiered regulatory pathways. To effectively modernise the Scheme, there is a need to consider risk proportionate regulation of new and emerging technologies and avoid over-regulation when there is no clear risk-indicators to human health and safety and the environment.

Thank you for your consideration of this submission.

Regards,



**Pat O'Shannassy**  
**CEO**

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<sup>1</sup> <https://www.agriculture.gov.au/ag-farm-food/biotechnology/international-statement-agricultural-applications-precision-biotechnology>



## Membership List as at 1 March 2021

| Organisation  | Contact             | Website /Phone                  |
|---|---------------------|---------------------------------|
| <b>Ordinary Member (Trading)</b>                          |                     |                                 |
| <b>Level A1 (over 7 Million Tonnes)</b>                   |                     |                                 |
| CBH Grain Pty Ltd   | Mr Jason Craig      | cbh.com.au                      |
| Glencore Agriculture Pty Ltd                              | Mr Philip Hughes    | glencoreagriculture.com.au<br>2 |
| <b>Level A2 (5 - 7 Million Tonnes)</b>                    |                     |                                 |
| Graincorp Operations Ltd                                  | Mr Robert Spurway   | graincorp.com.au<br>1           |
| <b>Level A3 (3 - 5 Million Tonnes)</b>                    |                     |                                 |
| ADM Trading Australia Pty Ltd                             | Mr Darryl Borlase   | adm.com                         |
| Cargill Australia Limited                                 | Mr Erik Wibholm     | cargill.com.au<br>2             |
| <b>Level A4 (1.5 - 3 Million Tonnes)</b>                  |                     |                                 |
| <b>Level B1 (1.0 - 1.5 Million Tonnes)</b>                |                     |                                 |
| Emerald Grain Pty Limited                                 | Mr David Johnson    | emeraldgrain.com                |
| Cofco International                                       | Ms Sara Pan         | cofcoagri.com.au<br>2           |
| <b>Level B2 (500,000 - 1 Million Tonnes)</b>              |                     |                                 |
| 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<br>10    |
| <b>Level B3 (250,000 - 500,000 Tonnes)</b>                |                     |                                 |
| Allied Pinnacle Pty Ltd                                   | Mr Josh Lawrence    | alliedpinnacle.com              |
| Robinson Grain Trading Co Pty Ltd                         | Mr Gary Robinson    | robinsongrain.com.au            |
| Wilmar Gaviion 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<br>5                 |
| <b>Level C1 (over 10 employees, under 250,000 Tonnes)</b> |                     |                                 |
| 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       | bfb.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     |
| Ruddenklau Grain Pty Ltd                | Mr Tim Ruddenklau      | 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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