

3<sup>rd</sup> May 2023

Assistant Secretary  
Advice and Investment Branch  
The Treasury  
Langton Crescent  
Parkes ACT 2600

Via email: [FinancialAdvice@treasury.gov.au](mailto:FinancialAdvice@treasury.gov.au)

**RE: Submission on Treasury Laws Amendment (Measures for Consultation) Bill 2023: Financial Adviser Professional Standards Exposure Draft**

**1. Introduction**

Grain Trade Australia (GTA) welcomes an opportunity to provide feedback on the Government's Exposure Draft Treasury Laws Amendment (Measures for Future Bills) Bill 2023: Recognising experience in the financial advice industry.

This submission is in addition to previous GTA submissions to Treasury plus correspondence written to Treasury portfolio Ministers and ASIC to raise concerns with the financial advisor's education requirement and the AFSL regulations and guidelines. Feedback has included:

22 <sup>nd</sup> September 2022	1. The Quality of Advice Review Proposals Paper ( <a href="#">Link: here</a> )
21 <sup>st</sup> September 2022	2. The Financial Adviser education standards consultation paper 2022 ( <a href="#">Link: here</a> )
2 <sup>nd</sup> June 2022	3. The Quality of Advice Review Issues Paper ( <a href="#">Link: here</a> )
4 <sup>th</sup> February 2022	4. The draft Terms of Reference for the Government's <i>Review of the Quality of Financial Advice</i> to consider how the regulatory framework could better enable the provision of high quality, accessible and affordable financial advice for retail investors; ( <a href="#">Link: here</a> ) and
1 <sup>st</sup> February 2022	5. The Government's Policy Paper "Education Standards for Financial Advisors" published in December 2021 ( <a href="#">Link: here</a> ).

This Submission is in line to this prior correspondence.

Previous submissions and correspondence have in principle been supportive to a regulatory approach that is:

1. relevant to the context,
2. has simplicity in its design,
3. understanding and subsequent application.

This is because this form of approach will minimise the cost burden on business and may avoid cost increases to consumers and minimise distortion in business efficiency and serve the desired outcomes.

A key GTA design principle is to not provide a 'one size fits all' approach to Financial Adviser Professional Standards as the sector and its services to clients has proven to be too diverse for this form of industry education standard.

GTA remains concerned with the overall regulatory Financial Services regime, as to its application and impact on the grain industry and GTA members. We have again taken the opportunity of raising some of these issues in this submission.

## 2. About GTA

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, 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](#) and in the addendum attached to this submission.

GTA's core focus is to “**facilitate trade**” in the Australian grain industry. It's 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.

A key segment within this industry framework is GTA members who provide commodity marketing & price risk management services (advisory services) to Australian grain producers and consumers.

## 3. The role of Commodity Marketing & Advisory Services

GTA members who provide advisory services provide grain producers and consumers with the information and advice needed to make informed decisions on their commodity marketing and commodity price risk management. This includes:

1. Commodity (grain) market analysis and price discovery,
2. Brokerage of physical grain,
3. Use of price risk management tools (derivatives like Swaps, Futures, Options),
4. Hedging foreign exchange (either a part of a derivative or for cash flow purposes), and
5. Grain sale and contract optimisation.

A grain marketing advisor with an AFSL provides advice specifically to help a grain producer or consumer manage their price risk in relation to the particular commodity using specific financial products. The advisor in this case is not providing holistic plans in relation to a client's broader investment needs (superannuation, insurance etc) but scoped, focussed advice related to commodity price risk – which is usually a specific condition under their AFSL.

So, for a grain grower or consumer this is **not an investment decision but more a transactional decision to manage grain price risk**. This means the role, expertise and skill sets of a commodity marketing advisor is very distinctive from a financial planner and therefore from the “one size fits all” approach that has been adopted by FASEA. The FASEA model assumed all financial service providers require the skillsets, experience, and qualifications of a financial planner.

## 4. GTA comments on the Treasury Laws Amendment

In terms of the reform outlined in the *Treasury Laws Amendment (Measures for Consultation) Bill 2023: Financial Advisor Professional Standards Exposure Draft*, GTA offers the following comments:

- GTA confirms its support to remove tertiary education requirements for financial advisers who have passed the exam, have 10 years' experience and a clean record of financial advice practice. Although, we note our previous submissions with regards to the exam, in terms of its lack of relevance to some sectors (including grains) and that the exam should be more tailored to broader contexts and segments.

- However, given the nature of advice provided by grain marketing advisers we believe that other relevant experience, such as **trading or risk management in relevant (eg grain) markets** should be also considered as relevant experience, rather than only financial advising experience.
  - It is this broader type of experience that can help advisors develop a deeper understanding of the relevant markets and risks, and therefore provide better quality advice to their clients.
  - Such experience would be more relevant in a grain context than an advisor who had previous experience in say insurance or equities. GTA has previously suggested a practical solution to this would be to allow licensee's and / or potentially industry associations to determine what experience they consider relevant to their business and clients.
- We remain concerned with the proposed cut-off date for the experienced pathway on 31 December 2021. Whilst an improvement on the proposed 1 January 2019 we still believe this should be extended to 30th June 2022 (at least) or to date closer to the implementation of the reforms, as it would in effect mean a current experienced advisor would require at least 13 years' experience (ie not 10 years), and noting that from a grains perspective, the volatility in the grain markets from Covid-19 and Russian invasion of Ukraine has been unprecedented, and provide significant experience to grain industry advisors during these times.
  - Further, we do not support an expiry date for which experienced advisors, that do not fully comply with the stated 'experienced provider' requirements are required to undertake tertiary study, as this makes the intended purpose and outcomes of the experienced pathway meaningless and redundant. There needs to be some discretion and allowance in particular cases including where a grain marketing adviser who may have 15 years of grain market experience and 6 years of providing marketing advice to grower clients. This may be something that can hopefully be dealt with through the 'as determined by the Minister' arrangement. Clarification on this would be appreciated.
- We believe the draft arrangements have not moved significantly from the failed FASEA 'one size fits all' approach. The proposed reforms still fail to adequately recognise the diversity of sectors and client risks within 'financial services and assumes or in fact dictates that anyone providing **any sort of financial advice**, must be trained as a financial planner, despite the relevance to the client's situation and the end objective of providing good quality advice to the client.
- Currently the scope of approved tertiary degrees remains too narrow and, in many instances, **irrelevant to providing grain price risk and marketing/financial advice**. In our view the core knowledge areas should be contextualised for the relevant sector (eg financial planning, insurance, stock broking, agricultural price risk management) and include a broader range of knowledge areas such as commodity derivatives, foreign exchange and degrees such as commerce, economics, agri-business, agricultural science, agricultural economics and agricultural marketing.
  - GTA notes there is now a pathway in the Treasury Laws Amendment for **the Minister to approve individual applications for equivalent domestic qualifications**. This may prove to be of benefit to grain marketing advisers and other sectors. However, there is not enough detail provided in the Exposure Draft Explanatory Material to understand the value or the process for application.
- As previously raised the Exam is not fit for purpose. We would suggest that the Exam be made more relevant to an adviser's situation, and that there could be choices of different scenarios included in the exam.
- In considering a 'clean disciplinary record' we would suggest the focus should be on dishonest, misleading and deceptive unethical conduct rather than minor breaches of a technical or administrative nature. We recognise that multiple instances of minor breaches could be addressed with the adviser/licensee.
- We remained concerned with the proposed continuing professional development requirement for an advisor to complete 40 hours of CPD per year including a prescribed breakdown of

minimum hours to be spent in various areas. For example, the hours required on professionalism and ethics (seemingly every year) should be proportionate against other areas such as technical competence. We support CPD however believe there should be flexibility to customise to the specific needs, and circumstances of the industry / sector, the advisers and any AFSL restrictions.

- We do not support mandating a professional year standard, as it presents another cost barrier for business and/or new entrants (who will have already passed a recognised degree) into industry. As noted earlier above, we suggest specialisation and training requirements should be aligned with AFSL conditions and can be addressed through practical experience and tailored contextualised professional development.

## **5. Regulatory Burden**

We wish to reiterate the ongoing legislation and regulation since 2016 in relation to financial advice, in particular the Corporations Amendment (Professional Standards of Financial Advisors) Act 2017 are placing an increasing compliance burden and financial cost on our relevant members. The financial burden includes:

- costs related to the FASEA exam,
- the on-going cost of CPD,
- the ASIC industry funding levy,
- various ASIC lodgement fees, and
- uncertainty surrounding levies to fund the Compensation Scheme of Last Resort.

The increasing costs are either in part passed onto the consumer of these services (making the cost of obtaining advice for those more in need - more prohibitive) or being absorbed into the advisory business (usually a small business) leading to advisers increasingly questioning the sustainability of continuing to provide advice.

In our view, the regulatory burden on business, inclusive of maintaining an environment for businesses to compete, and the ultimate impact on consumers, needs to be a priority of reform. We believe Government should aspire for greater impact than what is contained in the Financial Adviser Professional Standards Exposure Draft.

## **6. Impact on Industry and GTA members**

Getting the Standards balanced is critical for the grain industry being able to maintain experienced advisers and attract new entrants to ensure grain growers have access to highly specialised advisers.

Without further change than what is proposed to education standards there will be experienced advisers leave the industry that will be difficult to replace with new entrants.

The sector needs to attract new entrants, and these people are more likely to come from (and have interest in the industry) a background of degrees in commerce, economics, finance, agriculture, and business (in essence commodity and currency markets) and not financial planning.

It is also important to understand grain advisory firms are small rural businesses (1-7 advisers) and do not have the financial ability to fund sizable salaries while potential new and existing advisers' re-train.

## **7. Conclusion**

GTA supports licensing of financial advisers and supports the ability of consumers (in this case grain producers and consumers) being able to access professional, ethical and high-quality advice.

We support change to the legislative instruments that were established by FASEA and promote educational relevance as a key tenet of the Education Standards for financial advisors.

However, this should not be a 'one size fits all' approach given GTA members that hold an AFSL usually have them for the limited scope of providing financial product advice (or dealing in a financial product) for the designated products only of derivatives and foreign exchange. The training requirements should be aligned to the Licence scope and the determination of an 'experienced provider' should be flexible and in the context of grain marketing advisors should consider the experience and time spent working within a grain market facing role as part of the experience

GTA is supportive of change that:

- a) Recognises financial advice is broader or more specific than financial planning.
- b) Defines educational requirements to meet the specific needs of sectors, are aligned with licence conditions, rather than assuming all financial advisors provide financial planning.
- c) Includes Tertiary (degree) level study for commerce, business, finance, economics, science, agribusiness, agricultural marketing, agricultural economics, agricultural science, rural science as formally recognised suitable "related fields of study" for the proposed Qualification pathway.
  - o Existing advisors' qualifications in these disciplines be grand fathered in.
- d) Supports relevant industry experience that supports the provision of grain marketing services is recognised as relevant in the Experience pathway.
- e) Provides the ability and flexibility to tailor CPD requirements to the specific needs and circumstances of industry sectors, AFSL conditions and the advisors themselves.

GTA would welcome the opportunity to engage directly with Government to increase the understanding of the type of financial advice our members provide and to provide input into, or be part of, any process that aims to make a more appropriate fit for purpose regulatory model.

Please do not hesitate to contact GTA on this or any other relevant matters.

Yours faithfully,



**Pat O'Shannassy**  
**CEO, Grain Trade Australia**

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
Viterra Australia Pty Ltd	Mr Philip Hughes	glencoreagriculture.com.au
Graincorp Operations Ltd	Mr Robert Spurway	graincorp.com.au
		<b>3</b>
<b>Level A2 (5 - 7 Million Tonnes)</b>		
		<b>0</b>
<b>Level A3 (3 - 5 Million Tonnes)</b>		
Cargill Australia Limited	Mr Zsolt Kocza	cargill.com.au
		<b>1</b>
<b>Level A4 (1.5 - 3 Million Tonnes)</b>		
ADM Trading Australia Pty Ltd	Mr Darryl Borlase	adm.com
		<b>1</b>
<b>Level B1 (1.0 - 1.5 Million Tonnes)</b>		
Emerald Grain Pty Limited	Mr David Johnson	emeraldgrain.com
Manildra Group	Mr Peter Sloan	manildra.com.au
Arrow Commodities Pty Ltd	Mr Dominic Vanzella	arrowcom.com.au
Bunge Agribusiness Australia Pty Ltd	Mr Stephen Bennett	bunge.com/agribusiness
CHS Broadbent Pty Ltd	Mr Steve Broadbent	broadbentgrain.com.au
Riordan Grain Services	Mr Mark Lewis	riordangrains.com.au
		<b>6</b>
<b>Level B2 (500,000 - 1 Million Tonnes)</b>		
Australian Grain Export Pty Ltd	Mr Brett Dodson	australiangrainexport.com.au
Centre State Exports Pty Ltd	Mr Jeff Voigt	centrestateexports.com.au
Cofco International	Ms Sara Pan	cofcoagri.com.au
George Weston Foods Limited	Mr Mark O'Brien	gwf.com.au
Inghams Enterprises Pty Ltd	Mr Matt Clarke	ingham.com.au
Ridley Agriproducts Pty Ltd	Mr Michael Reeves	agriproducts.com.au
Riverina (Australia) Pty Ltd	Mr Gareth Stapleton	riverina.com.au
ETG Commodities Pty Ltd	Mr Peter McMeekin	peter.mcmeekin@etgworld.com
		<b>8</b>
<b>Level B3 (250,000 - 500,000 Tonnes)</b>		
Allied Pinnacle Pty Ltd	Mr Brett Duczmal	alliedpinnacle.com
Robinson Grain Trading Co Pty Ltd	Mr Gary Robinson	robinsongrain.com.au
Wilmar Gaviola Pty Ltd	Mr Matt Albion	07 3713 8700
Louis Dreyfus Company Australia Pty Ltd	Mr Oliver Reid	louisdreyfus.com.au
Quadra Commodities Pty Ltd	Mr Robin Cassar	quadra.com
Brahman Commodities Pty Ltd	Mr Michael Aikman	brahmancommodities.com.au
Boolah Farms Pty Ltd	Mr Stuart Tighe	02 6754 0343
Fletcher International Exports Pty Ltd	Mr Kurt Wilkinson	fletchint.com.au
K M & W M Kelly & Sons	Mr Matt Kelly	kellygrains.com.au
Demeter Grains	Mr David Oates/Barry Mansfield	08 9410 5818
		<b>10</b>
<b>Level C1 (over 10 employees, under 250,000 Tonnes)</b>		
Adams Australia Pty Ltd	Mr Ian Mack	adamsaustralia.com.au
Agracom Pty Ltd	Mr Joe Hallman	agracom.com.au
Agri Management Pty Ltd	Mr Brett Stevenson	02 9499 4199
AGT Foods Australia	Mr Michael Brittain	agtfoods.com/australia
Associated Grain t/a Agrocorp Processing Australia	Mr Bhuvan Gandhi	07 4662 1999
Australian Food and Fibre	Mr Peter Webb	australianfoodandfibre.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
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
Deckert Group Pty Ltd	Mr Chris Deckert	deckerts.com.au
DDT Holdings Pty Ltd	Mr Rajeev Saraff	ddtholdings.com.au
Esperance Quality Grains	Mr Neil Wandell	members.westnet.com.au/eqg
Hanlon Enterprises Grain	Mr Chris Coates	hanlonenterprises.com.au
Hazeldenes Chicken Farm Pty Ltd	Mr Marcus Dingle	hazeldenes.com.au
HX Food Group (Aus) Pty Ltd	Mr Dong Zhao	hxfoodgroup.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 Ayush Rajvanshi	itochu.com.au
Inari Australia Pty Ltd	Mr Karan Singh	inariaustralia.com.au
J K International Pty Ltd	Mr Sandeep Mohan	jki.com.au
Rex James Stockfeed Pty Ltd	Ms Natasha Davies/Samuel James	jamesstockfeed.com.au
Jerilderie Grain Storage & Handling	Mr David Barlow	03 5886 0344
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 Trevor Perryman	03 5277 1950
Mandala Trading Pty Ltd	Mr Jayjeev Saraff	mandalatrading.com.au
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
Premium Grain Handlers P/L	Mr John Orr	pgh.com.au
Quattro Ports	Mr Dave Allen	quattroports.com.au
Reid Stockfeeds Pty Ltd	Mr Nick Reid	reidstockfeeds.com.au
Rivalea (Australia) Pty Ltd - Animal Nutrition	Mr Andrew Philpotts	rivalea.com.au
SunPork Farms Feed Mills	Mr Mark Young	08 8532 4434
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
Viridis Ag	Mr Anthony Howard	viridisag.com

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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	advantagegrain.com.au
Access Grain Pty Ltd	Mr Wade Humphreys	accessgrain.com.au
Agmark Commodities	Mr Richard Alcorn	agmark.com.au
Agri Om Australia Pty Ltd	Mr Kishore Bulchandani	agriom.com.au
Agri-Oz Exports Pty Ltd	Mr Francois Darcas	03 9830 7021
Agromin Australia Pty Limited	Mr Rajni Patel	agromin.com.au
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
Avoca Grain Storage Pty Ltd	Ms Julie Bartlett	03 5465 3633
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 Charles Coventry	brounandco.com.au
C & S Trading Pty Ltd	Mr Craig Scholz	scholzbh.com.au
C K Tremlett Pty Ltd	Mr Andrew Tremlett	08 8524 9050
Carpendale Agri Pty Ltd	Mr Andrew Kluck	0448 761 246
Carson Stockfeeds Pty Ltd	Mr John Carson	0429 601 201
Chester Commodities Pty Ltd	Mr Richard Black	chestercommodities.com.au
CL Commodities Pty Ltd	Mr Robert Lean	clcommodities.com.au
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
Deacon Seeds Company	Mr Mark Schmidt	07 4662 3217
Defiance Maize Products Pty Ltd	Mr Rodney Walker	corson.co.nz
Direct Grain Pty Ltd	Mr Mark Davis	directgrain.com.au/
Direct Commodities Pty Ltd	Mr Hamish Robertson	directcommodities.com.au
East Coast Stockfeed Pty Ltd	Mr Stuart Dolden	ecsf.com.au
Ellerslie Free Range Farms Pty Ltd	Mr Bruce Holden	07 4695 5777
ETG Processing Pty Ltd T/A Wimpak	Mr James French	wimpak.com.au
Export Import Australia Pty Ltd	Mr Dhanesh Kumar	exportimportaustralia.com.au
Export Trading Group Australia Pty Ltd	Mr Shayne Clark	etgworld.com
Fanmac Logistics Pty Ltd	Mr Chris Fanning	fanmaclogistics.com.au
Feed Central Pty Ltd	Mr Tim Ford	feedcentral.com.au
Findlays Borellan	Mr Neil Findlay	02 6963 9246
Forest Enterprises Development & Consulting Pty Ltd	Mr Charles Lowe	02 6662 8261
Grenfell Commodities Pty Ltd	Mr Glenn Beasley	grenfell.com.au
GO Resources Pty Ltd	Ms Rosemary Richards	go-resources.com.au

Godde's Grain & Fertiliser Pty Ltd	Ms Bec Leitch	02 6029 8332
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
GV Grain & Fodder	Ms Joanne Harry	03 5828 3063
Hartree Partners (Australia) Pty Ltd	Mr Daniel Miller	hartreepartners.com
Harwood Grains Pty Ltd	Mr Paul Harwood	harwoodgrains.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
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
Marina Commodities	Mr Palwinder Singh	marinacommodities.com
McKenzie Ag Services	Mr Lachlan McKenzie	mckenzieag.com.au
McNaughts Grains & Fertilizer Pty Ltd	Mr Daniel McNaught	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
Nandaly Grain Co-Operative Ltd	Mr John Bucknall	03 5078 1217
Network Grains Pty Ltd	Mr Craig Dennis	07 4637 8500
Origin Grain Pty Ltd	Mr Peter Brick	03 5720 8500
Outlook Commodities Pty Ltd	Mr Dominic Hogan	0419 351 845
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
Pearson's Grain Pty Ltd	Mr Darren Pearson	pearsonsgroup.com.au
Peters Commodities Pty Ltd	Mr Michael Oxley	petcom.com.au
Pinnacle Grains Pty Ltd	Mr Sonal Vij	0451 002 482
Plum Grove Pty Ltd	Ms Rikki Foss	plumgrove.com.au
Pure Foods Eggs Pty Ltd	Ms Charmain Cain	purefoods.com.au
QS Commodities Pty Ltd	Mr Nick Slipper	0439 173 907
Quirindi Grain & Produce	Mr John Webster	02 6746 1911
RP Grain Pty Ltd	Mr Gordon Pulham	rpgrain.com.au
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
Southern Grain Pty Ltd	Mr Tim Gross	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
Targray Australia Pty Ltd	Mr Srinivas Boyapalli	targray.com
Tiller Commodities Pty Ltd	Mr Brett Cooper	tillercommodities.com
TRC International Pty Ltd	Mr Yohan Goonetilleke	0412 921 812
Ulusoy Asia Pacific	Mr Mark Madjarevic	ulusoyflour.com
Universal Commodity Management	Mr Tim Dean	commoditymanagement.com.au
Ward McKenzie Pty Ltd	Mr Geoff Hammon	mckenziefoods.com.au
Watson's Bulk Logistics	Mr Joel Watson	wbl.net.au
WHG Oceania Pty Ltd	Mr Gesheng Shen	02 8040 3030
Wurrinour Transport & Trading	Mr Karl Hendy	wurrinourtransport.com.au
WW Agri Pty Ltd	Mr Steve Sloss	wwagri.com.au
ZTC Australia	Mr Tim Byass	ztcaus.com

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#### Transport Operator

Crawfords Freightlines Pty Lts	Mr Phillip Davis	crawfordsfreightlines.com.au
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	horneaglogistics.com.au
Pacific National (NSW) Pty Ltd	Mr Nick Ryder	pacificnational.com.au
SEAWAY Intermodal Pty Ltd	Mr Bikash Ram	seawayintermodal.com.au

#### Broker

Large		6
		0



## Medium

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
Rain Argibusiness	Mr Ian Grellman	rainag.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
Pure Grain Network Pty Ltd	Mr Stuart Tighe	puregrain.com.au
Quest Commodities Pty Ltd	Ms Jayne Barker	questcommodities.com.au
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
Farm Tender	Mr Matt Henke	farmtender.com.au
Lotema Pty Ltd	Mr Todd Lees	lotema.com.au
Mallon Commodity Brokering	Mr Ian Mallon	
Woodside Commodities Pty Ltd	Mr Hamish Steele-Park	woodcomm.com.au

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## Corporate

<b>Large</b>		
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
Barrett Burston Malting Co Pty Ltd	Mr Dean Ganino	bbmalt.com.au
Boortmalt Asia Pacific Pty Ltd	Mr Simon Robertson	boortmalt.com
Commonwealth Bank of Australia	Mr Samuel Chambers	commbank.com.au
National Australia Bank Ltd	Mr Christian Bowes	nab.com.au
NSW Ports	Mr Campbell Mason	nswports.com.au

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## Medium

AgriDigital	Mr Henry McKay	agridigital.io
AgriFood Technology Pty Ltd	Mr Rob Anderson	03 9742 0589
Amspec Australia Pty Ltd	Mr Lee Shilvock	amspecgroup.com
Australian Superintendence Company	Mr Andrew Parry	07 3391 8640
Commodity Inspection Services (Australia) Pty Ltd	Mr James Saunderson	commodityinspection.com.au
Foss Pacific Pty Ltd	Mr Phil Soderberg	foss.com.au
Holding Redlich	Mr Geoff Farnsworth	holdingredlich.com
HFW Australia	Mr Stephen Thompson	hfw.com
Intertek	Mr Ben Jones	intertek.com
Mars Petcare t/a Mars Birdcare	Mr Kurt Sosinski	07 3719 0100
Oldendorff Carriers	Mr Ben Harper	oldendorff.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
Qube Logistics (SB) Pty Ltd (T/A Qube Agri)	Mr Jeremy Brown	qube.com.au/logistics/agri/

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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
Agvise (WA) Pty Ltd	Mr Shane Sander	agvise.com.au
Aperture Ag Pty Ltd	Mr Alex Campbell	0450 201 103
Basis Commodities Pty Ltd	Mr Chris Whitwell	basiscommodities.com
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
Futari Holding Pty Ltd	Ms Leah Petrie	futari.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
Guud Asset Cerium Pty Ltd	Mr Eric Chen	
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
Indyn Pty Ltd	Mr Rob Martin	indyn.net
Lachstock Consulting Pty Ltd	Mr Nick Carracher	lachstockconsulting.com.au
Longbridge Commodities Pty Ltd	Ms Kareen Durr	longbridge.com
MarketAg Pty Ltd	Mr Mark Martin	02 6747 1590
McMullen Consulting Pty Ltd	Mr Gerard McMullen	03 8300 0108
Mercari Pty Ltd	Mr Daniel Marsh	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	praig.com.au
Primal Foods Group	Mr Peter Longhurst	primalfoodsgroup.com
Profarmer Australia Pty Ltd	Mr James Maxwell	australiancropforecasters.com.au
Rise Agribusiness Pty Ltd	Mr Ian Dalglish	riseagri.com.au
Pinion Advisory	Mr Chris Heinjus	ruraldirections.com
Saputo Dairy Australia Pty Ltd	Mr Ashley Denishensky	1800 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	ttclub.com
Ultimate Global Trading Pth Ltd	Mr Andrew Alexopoulos	ultimategt.com.au
Wattleree Consulting Pty Ltd	Mr Jon Bucknall	
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<b>International Affiliate</b>		
CIS - Commodity Inspection Services	Mr Paul Schweitzer	cis-inspections.com
		<b>1</b>
<b>Industry Association</b>		
Australia Export Grain Innovation Centre	Mr Richard Simonaitis	aegic.org.au
Grain Growers Limited	D. McKeon	graingrowers.com.au
Grain Industry Association of WA	Mr Peter Nash	giwa.org.au
Grain Producers Australia Ltd	Mr Colin Bettles	grainproducers.com.au
NSW Farmers Association	Mr Peter Arkle	02 9478 1000
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<b>Merchant Association</b>		
Grain Industry Association of SA	Ms Marie Cunningham	+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
		<b>4</b>
<b>Life Members</b>		
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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