

24<sup>th</sup> May 2024

Department of Agriculture, Fisheries and Forestry  
GPO Box 858  
Canberra ACT 2601

Email: Via Web

**Re: Submission: Cost Recovery Implementation Statement: Plant Export Certification**

Dear Sir/Madam,

Thank you for the opportunity to reply to the call for submissions on the Cost Recovery Implementation Statement (CRIS) for the grain industry in relation to grain export regulatory activities charged by the Department of Agriculture, Fisheries and Forestry (DAFF).

Grain Trade Australia (GTA) is a member of the DAFF Grain and Plant Products Export Industry Consultative Committee (GPPEICC). GTA is a national association and 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 drawn from all sectors of the grain value chain from production to domestic end users and exporters. GTA has over 285 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.

As the exporters of grain from Australia, it is GTA members who pay for the grain export cost recovery (ECR) program.

**1. Value of Australian Export Regulations**

The Australian 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 managed by DAFF to ensure grain meets importing country quarantine requirements. GTA and its members fully support those regulations and work collegiately with DAFF to achieve our joint objectives.

**2. Government Direction & DAFF Performance against its Strategy**

*2.1 Financial Performance / Service*

The Department's financial difficulties during 2023 were well publicised leading to reported:

- restrictions on non-essential travel and training;
- re-prioritising non-critical projects; and
- a reduction in contracted workforce numbers.

During 2023 GTA and its members were aware of restrictions applied to grain industry projects (for example the ePhyto and Grain Storage Assets and Management Standard projects) and DAFF staff because of the reported financial difficulties. This was concerning given the grain industry has seen some of the best seasons of production and consequently exports in recent years. As a result of these seasons, the grain export cost recovery (ECR) program has exceeded budget over the last three seasons and the Department have reported a Cost Recovery Reserve balance of \$3,591,128 at the commencement of the 2024-25 budget period.

GTA notes at the last GPPEICC finance meeting the 2023-24 grain surplus is likely to be \$2m as compared to the CRIS Table 5 that indicates a Balance (X-Y) of \$150k. GTA estimated this takes the grain ECR reserve to a balance of \$5.4m at the commencement of the 2024-25 budget period.

It is critically important to consider the **effectiveness and the application** of the DAFF cost recovery model and the impact it has on the agricultural industry's efficiency. The grain industry operates under a globally competitive market and for Australian participants to be successful an efficient, low cost and competitive operating environment is required including the provision of government services.

The Productivity Commission Guidelines on Cost Recovery by Government Agencies describes the key principle of government *cost recovery mechanisms* as:

*“Cost recovery should be implemented for **economic efficiency reasons**, not merely to raise revenue”.*

In 2019 a review by the Australian Audit Office (AAO) of how DAFF applies the Governments Cost Recovery Principles noted and recommended -

*The Department:*

- *uses the current review of its charging arrangements to align its fees and levies with the Cost Recovery Guidelines; and*
- *develops a cost recovery model that aligns the prices, expenses and revenues of outputs within regulatory activities to the efficient cost of providing those outputs.*

It is noted whilst DAFF agreed to this Recommendation there has been little to no change since this AAO Review.

The grain industry position is the cost recovery mechanism must adhere to Government policy objectives, including the key principle of transparency and the provision of cost-effective services. Restriction of services to a sector operating during an intense export period with excess Export Cost Recovery (ECR) funds would not appear to be adhering to Government policy objectives.

The grain industry has accepted regulatory charges on the basis that DAFF (i.e. Government) should be accountable to industry for the efficient use of these funds and the funds should only be utilised for the purpose on which they are collected or for the benefit of the group (i.e. grain exporters) from which they were charged and collected. Given the other agricultural sectors Reserve Balances being substantially negative and the reported parlous state of DAFF's finances the grain industry is concerned its funds were not efficiently utilised, and potentially subsidised other sectors, for example a disproportionate allocation of costs (such as occurred with the allocation of Ag Counsellor costs at the end of the FY2023-24 year).

We remain frustrated around the seemingly slow process and progress on some key technical market access issues, including new market access. For the size of the grain export program and the amount of cost recovery fees paid by grain exporters, we remain concerned that the allocation of resources such as technical experts to progress grain related technical market access issues is disproportionate to the fees paid. This is evident in the persistent and ongoing request by DAFF for industry to “prioritise” market access issues, to the point that only 1 or 2 issues seem to be worked on by DAFF at any one time. While we recognise other factors including other country's engagement, impact this, we would encourage more transparency, including across commodities, in this process to improve confidence and demonstrate value and equity of expended cost recovered funds.

## *2.2 Effective Cost Accounting & Management*

Whilst GTA supports cost recovery as a mechanism to provide key services not covered through Government consolidated revenue, this is based on being provided with access to information and discussion with DAFF that provides satisfaction the cost is balanced by the provision of an effective and efficient service.

The Grain and Plant Products Export Industry Consultative Committee (GPPEICC) is the principal forum for DAFF to consult with the grain, fodder, nuts, seed and timber industries on export inspection and certification, export market access and other relevant issues.

A focus for the GPPEICC is to review **DAFF performance against budget**. This has been hampered in recent times due to an inability to provide accounts data as a result of numerous issues including complexity due to the ‘*machinations of Government*’. This was concerning to the members of GPPEICC and raises further concern to the ECR model and its effectiveness. Further, if DAFF could

not report basic financial data to GPPEICC, we question how DAFF managers could effectively manage their own resources and budgets if they had no visibility of financial data.

In recent meetings GPPEICC members have noted improvement in the financial reporting of DAFF and its timeliness, however the poor previous financial reporting, necessitates a need for ongoing vigilance from GPPEICC members.

### 2.3 Digital Reforms and Transformative Projects

Government through its recent *Congestion Busting* investment dedicated \$222.2m to upgrade the Information Technology that underpins the government export system. This was seen as a much-needed investment to streamline and simplify DAFF processes and export services and to transform it into a modern and efficient partner for industry.

However, these projects and system upgrades do not appear to have delivered the anticipated step-change for the grain sector with grain still utilising *exdoc* whilst other sectors have transferred to *nextdoc*. The operation of multi-system platforms operated by DAFF must increase its cost of service and may hamper the efficiency of service to industry.

Industry also continues to face delays in the progress towards electronic phytosanitary certificates through the International Plant Protection Convention hub. This continues to remain a concern and focus for GTA members.

GTA welcomes and supports transformative projects that align industry and Government strategy and note the following joint projects that are underway:

1. The Grain Storage Assets and Management Standard
2. The Grain Assessment Technology Standard

These projects can transform Government and industry and provide benefits and a deeper understanding of each sectors objectives and issues. The joint approach to these and other projects will release value and assist in the longer term towards the goal of DAFF being the modern and efficient partner for industry that we all desire.

### 3. Review by the Department – Sustainable Export Funding Model

Government has allocated \$3.7m over three years to enable the development of an ongoing sustainable export funding model to ensure DAFF remains appropriately resourced to carry out its agricultural trade and export functions into the future.

This review is welcomed on the basis it focusses on **economic efficiency** rather than solely a focus on increasing revenue to plug the reported financial shortfalls of the Department.

We note the Grain CRIS states the 2021-22 cost as the base for the CRIS is no longer valid and extensive work is required to reset these figures. GTA questions this statement given a significant portion of DAFF regulatory activity costs are employee related. There has been minimal change to DAFF staff associated with services to the grain industry.

Whilst GTA supports cost recovery as a mechanism to provide key services not covered through Government consolidated revenue, this is based on being provided with access to information and engagement with DAFF that provides satisfaction the **cost is balanced** by the provision of an effective and efficient service. This is a difficult proposition as how does industry determine the value proposition of the DAFF fees given there is no market that operates for government services?

GTA has previously suggested a method to consider may include comparative benchmarking within DAFF and its service to each agricultural sector and also against other government departments. The 2019 AAO audit also proposed DAFF and other agencies **benchmark their costs and attempt to relate them to the market**. This would create greater transparency of the overall costs borne by the grain industry.

Greater transparency afforded through a **strategic benchmarking approach** should provide long-term benefits to industry and DAFF, resulting in potential cost savings to industry and a reduction in the overall budget of the Plant Export Operations branch responsible for provision of the regulatory

function. These should be considered as a component of the review of a sustainable export funding model.

#### 4. In Summery

- GTA considers it is critically important to consider the effectiveness and the application of the DAFF cost recovery model and the impact it has on the agricultural industry's efficiency.
- GTA supports cost recovery as a mechanism to provide key services not covered through Government consolidated revenue, this is based on being provided with access to information and engagement with DAFF that provides satisfaction the cost is balanced by the provision of an effective and efficient service.
- Understanding the value proposition of the DAFF fees and services is important to GTA and it is proposed DAFF as part of the sustainable export funding model consider processes to monitor and measure DAFF's services remain efficient and cost effective.

GTA consider such proposals to be aligned with the Government's strategy to grow agriculture industry value to \$100 billion by 2030.

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**



# GRAIN TRADE AUSTRALIA

Membership List as of 03 April 2024

Member Type ↑	Member Level ↑	Account Name	Primary Contact	Website
Ordinary Member	A1	CBH Group	Ben Macnamara	<a href="http://www.cbh.com.au">www.cbh.com.au</a>
		GrainCorp Australia	Robert Spurway	<a href="http://www.graincorp.com.au">www.graincorp.com.au</a>
		Viterra Australia	Philip Hughes	<a href="http://www.viterra.com.au">www.viterra.com.au</a>
			3	
	A3	Cargill Australia	Zsolt Kocza	<a href="http://www.cargill.com.au">www.cargill.com.au</a>
			1	
	A4	ADM Trading Australia	Darryl Borlase	<a href="http://www.adm.com">www.adm.com</a>
		Arrow Commodities	Dominic Vanzella	<a href="http://www.arrowcom.com.au">www.arrowcom.com.au</a>
		Australian Grain Export	Tim Martin	<a href="http://www.australiangrainexport.com.au">www.australiangrainexport.com.au</a>
		Bunge Agribusiness Australia Pty Ltd	Stephen Bennett	<a href="http://www.bunge.com">www.bunge.com</a>
		Louis Dreyfus Company Emerald Australia	Oliver Reid	<a href="http://www ldc.com">www ldc.com</a>
			5	
	B1	CHS Broadbent	Steve Broadbent	<a href="http://www.broadbentgrain.com.au">www.broadbentgrain.com.au</a>
		ETG Commodities	Peter McMeekin	<a href="http://www.etgworld.com">www.etgworld.com</a>
		George Weston Foods	Michael Schmidt	<a href="http://www.gwf.com.au">www.gwf.com.au</a>
		Manildra Group	Peter Sloan	<a href="http://www.manildra.com.au">www.manildra.com.au</a>
		Riordan Grain Services	Jim Riordan	<a href="http://www.riordangrains.com.au">www.riordangrains.com.au</a>
			5	
	B2	Centre State Exports	Jeff Voigt	<a href="http://www.centrestateexports.com.au">www.centrestateexports.com.au</a>
		Inghams Enterprise Pty Ltd	Matt Clarke	<a href="http://www.ingham.com.au">www.ingham.com.au</a>
		J K International Pty Ltd	Sandeep Mohan	<a href="http://www.jki.com.au">www.jki.com.au</a>
		Ridley Agriproducts	Michael Reeves	<a href="http://www.agriproducts.com.au">www.agriproducts.com.au</a>
		Riverina (Australia) Pty Ltd	Gareth Stapleton	<a href="http://www.riverina.com.au">www.riverina.com.au</a>
		Wilmar Gavilon Pty Ltd	Matt Albion	<a href="http://www.wilmargavilon.com">www.wilmargavilon.com</a>
			6	
	B3	Allied Pinnacle	Brett Duczmal	<a href="http://www.alliedmills.com.au">www.alliedmills.com.au</a>
		Boolah Farms Pty Ltd	Stuart Tighe	<a href="http://www.boolah.com.au">www.boolah.com.au</a>
		Brahman Commodities	Michael Aikman	<a href="http://www.brahmancommodities.com.au">www.brahmancommodities.com.au</a>
		Cofco International Australia	Sarah Pan	<a href="http://www.cofcointernational.com">www.cofcointernational.com</a>
		Demeter Grains	David Oates	<a href="http://www.demetergrains.com.au">www.demetergrains.com.au</a>
		K M & W M Kelly & Sons	Matt Kelly	<a href="http://www.kellygrains.com.au">www.kellygrains.com.au</a>
		Quadra Commodities Pty Ltd	Robin Cassar	<a href="http://www.quadra.com">www.quadra.com</a>
		Robinson Grain Trading	Adam Robinson	<a href="http://www.robinsongrain.com.au">www.robinsongrain.com.au</a>
			8	
	C1	Adams Australia Pty Ltd	Ian Mack	<a href="http://www.adamsaustralia.com.au">www.adamsaustralia.com.au</a>
		Agracom	Joe Hallman	<a href="http://www.agracom.com.au">www.agracom.com.au</a>
		Agrisk (Market Check)	Brett Stevenson	<a href="http://www.marketcheck.com.au">www.marketcheck.com.au</a>
		AGT Foods Australia	Michael Brittain	<a href="http://www.agtfoods.com/australia">www.agtfoods.com/australia</a>
		Associated Grain t/a Agrocorp Processing Australia	Russell Darbey	<a href="http://www.agrocorp.com.au">www.agrocorp.com.au</a>
		Australian Food & Fibre Processing	Peter Webb	<a href="http://www.australianfoodandfibre.com.au">www.australianfoodandfibre.com.au</a>
		Australian Fresh Milk Holdings (AFMH)	Jill Smith	<a href="http://www.afmh.com.au">www.afmh.com.au</a>
		BFB Pty Ltd	Shane Bird	<a href="http://www.bfb.com.au">www.bfb.com.au</a>
		Blairs Produce Company	Sean Blair	<a href="http://crt.com.au/store/blairs-produce-company/">crt.com.au/store/blairs-produce-company/</a>
		Castlegate James Australasia Pty Ltd	Ross Giovanetti	<a href="http://www.castlegatejames.com.au">www.castlegatejames.com.au</a>
		COPRICE	Krissy Campbell	<a href="http://www.coprice.com.au">www.coprice.com.au</a>
		Darwalla Milling Co Pty Ltd	Gary Heidenreich	<a href="http://www.darwalla.com.au">www.darwalla.com.au</a>
		DDT Holdings	Rajeev Saraff	<a href="http://www.ddtholdings.com.au">www.ddtholdings.com.au</a>
		Deckert Group Pty Ltd	Chris Deckert	<a href="http://www.deckerts.com.au">www.deckerts.com.au</a>
		Esperance Quality Grains Pty Ltd	Neil Wandel	<a href="http://www.esperancequalitygrains.com">www.esperancequalitygrains.com</a>
		Fletcher International Exports	Joe Masters	<a href="http://www.fletchint.com.au">www.fletchint.com.au</a>
		Fodder Link Pty Ltd	Cameron Angel	<a href="http://www.fodderlink.com.au">www.fodderlink.com.au</a>
		Hanlon Enterprises	Chris Coates	<a href="http://www.hanlonenterprises.com.au">www.hanlonenterprises.com.au</a>
		Hazeldenes Chicken Farm	Marcus Dingle	<a href="http://www.hazeldenes.com.au">www.hazeldenes.com.au</a>
IGH Commodities		Brad Bryant	<a href="http://www.igh.net.au">www.igh.net.au</a>	
Inari Australia		Karan Singh	<a href="http://www.inariaustralia.com.au">www.inariaustralia.com.au</a>	
Irwin Stockfeeds		Bryan Irwin	<a href="http://www.irwinstockfeeds.com.au">www.irwinstockfeeds.com.au</a>	
Itochu Australia Ltd		Ayush Rajvanshi	<a href="http://www.itochu.com.au">www.itochu.com.au</a>	
Jerilderie Grain Storage & Handling		David Barlow	<a href="http://www.jgsh.com.au">www.jgsh.com.au</a>	
Laucke Flour Mills Pty Ltd		Roger Laubsch	<a href="http://www.laucke.com.au">www.laucke.com.au</a>	
Lawson Grains Pty Ltd		John Marshall	<a href="http://www.lawsongrains.com">www.lawsongrains.com</a>	
LPC Trading Pty Ltd		Simon Langfield	<a href="http://www.lpctrading.com.au">www.lpctrading.com.au</a>	
Malteurop Australia Pty Ltd		Eric Fisher	<a href="http://www.malteurop.com/en/australia">www.malteurop.com/en/australia</a>	
MC Croker		Jason McPherson	<a href="http://www.crockergrain.com.au">www.crockergrain.com.au</a>	
MSM Milling Pty Ltd		Peter MacSmith	<a href="http://www.msmmilling.com.au">www.msmmilling.com.au</a>	
Namoi Cotton Ltd		Nathan Hunter	<a href="http://www.namoicotton.com.au">www.namoicotton.com.au</a>	
Newcastle Agri Terminal		Jock Carter	<a href="http://www.naterminal.com.au">www.naterminal.com.au</a>	
Pentarch Agricultural Pty Ltd	James Whiteside	<a href="http://www.pentarch.com.au">www.pentarch.com.au</a>		
Premium Grain Handlers P/L	John Orr	<a href="http://www.pgh.com.au">www.pgh.com.au</a>		
Quattro Ports	Dave Allen	<a href="http://www.quattroports.com.au">www.quattroports.com.au</a>		
Queensland Cotton Corporation	Ashish Govil	<a href="http://www.qcotton.com.au">www.qcotton.com.au</a>		

	Reid Stockfeeds Pty Ltd	Ian Reid	<a href="http://www.reidstockfeeds.com.au">www.reidstockfeeds.com.au</a>
	Rex James Stockfeed	Natasha Davies	<a href="http://www.jamesstockfeed.com.au">www.jamesstockfeed.com.au</a>
	Rivalea (Australia) Pty Ltd - Animal Nutrition	Andrew Philpotts	<a href="http://www.rivalea.com.au">www.rivalea.com.au</a>
	SunPork Farms Feed Mills	Mark Young	<a href="http://www.sunporkgroup.com.au">www.sunporkgroup.com.au</a>
	ThriveAgri Pty Ltd	Charlie Brown	<a href="http://www.thriveagri.com">www.thriveagri.com</a>
	TSS Grain (Tasmanian Stockfeed Services)	Trevor Macleod	<a href="http://www.tasstockfeed.com.au">www.tasstockfeed.com.au</a>
	Unigrain	Ervin Leong	<a href="http://www.unigrain.com.au">www.unigrain.com.au</a>
	Viridis Ag	Chris Reeves	<a href="http://www.viridisag.com">www.viridisag.com</a>
	W B Hunter Pty Ltd	Stewart Coombes	<a href="http://www.wbhunter.com.au">www.wbhunter.com.au</a>
	Wilken Grain	Richard Wilken	<a href="http://www.wilkens.com.au">www.wilkens.com.au</a>
	Woods Grain Pty Ltd	Bruce Woods	<a href="http://www.woodsgrain.com.au">www.woodsgrain.com.au</a>
	XLD Commodities	Paul Willows	<a href="http://www.xldgrain.com.au">www.xldgrain.com.au</a>
		48	
C2	Access Grain Pty Ltd	Wade Humphries	<a href="http://www.accessgrain.com.au">www.accessgrain.com.au</a>
	Aditi UVG	Harshad Kale	<a href="http://www.aditiuvg.com">www.aditiuvg.com</a>
	Aditya Birla Global Trading ( Australia)	Surya Jain	<a href="http://www.abgtrading.com">www.abgtrading.com</a>
	Advantage Grain Pty Ltd	Chris Nikolaou	<a href="http://www.advantagegrain.com.au">www.advantagegrain.com.au</a>
	Agmark Commodities	Richard Alcorn	<a href="http://www.agmark.com.au">www.agmark.com.au</a>
	Agri Om Australia Pty Ltd	Kishore Bulchandani	<a href="http://www.agriom.com.au">www.agriom.com.au</a>
	Agri-Oz Exports (Aust) Pty Ltd	Francois Darcas	<a href="https://www.linkedin.com/in/francois-darcas-4a440577">linkedin.com/in/francois-darcas-4a440577</a>
	Agromin Australia Pty Ltd	Rajni Patel	<a href="http://www.agromin.com.au">www.agromin.com.au</a>
	Arya Pulses Australia Pty Ltd	Aravindhan Ravindraraaj	<a href="http://www.aryapulses.com.au">www.aryapulses.com.au</a>
	A T Waterfield & Son Pty Ltd	Brad Waterfield	<a href="https://www.linkedin.com/in/brad-waterfield-8767869b">linkedin.com/in/brad-waterfield-8767869b</a>
	Australian - Asian Agricultural Exports (AAAX)	Mick Connolly	<a href="http://www.aaax.ws">www.aaax.ws</a>
	Australian Choice Exports Pty Ltd	James Hunt	<a href="http://www.australianchoiceexports.com.au">www.australianchoiceexports.com.au</a>
	Australian Grain Storage	Matt Bailey	<a href="http://www.sunrice.com.au">www.sunrice.com.au</a>
	Australian Growers Direct Pty Ltd	Tyrone Stowers	<a href="http://www.ausgrowersdirect.com.au">www.ausgrowersdirect.com.au</a>
	Australian Mungbean Company Pty Ltd	Damien White	<a href="http://www.australianmungbean.com.au">www.australianmungbean.com.au</a>
	A W Vater & Co	Kim Vater	<a href="http://www.vater.com.au">www.vater.com.au</a>
	Baker Grain	Richard Baker	<a href="http://www.bakergrain.com.au">www.bakergrain.com.au</a>
	Boort Grain Co-Operative	Jon Bucknall	<a href="http://www.boortco-op.com.au">www.boortco-op.com.au</a>
	Broun and Co Grain Pty Ltd	Charles Coventry	<a href="http://www.brounandco.com.au">www.brounandco.com.au</a>
	C & S Trading Pty Ltd	Craig Scholz	<a href="http://www.scholzbh.com.au">www.scholzbh.com.au</a>
	Carpendale Agri Pty Ltd	Andrew Kluck	<a href="http://www.carpendale.com.au">www.carpendale.com.au</a>
	Carson Stockfeed Pty Ltd	John Carson	03 6634 7376
	Chester Commodities	Richard Black	<a href="http://www.chestercommodities.com.au">www.chestercommodities.com.au</a>
	C K Tremlett Pty Ltd	Andrew Tremlett	<a href="https://www.linkedin.com/in/andrew-tremlett-36a06385">linkedin.com/in/andrew-tremlett-36a06385</a>
	CL Commodities	Robert Lean	<a href="http://www.clcommodities.com.au">www.clcommodities.com.au</a>
	Coorow Seeds	Brian Pover	<a href="http://www.coorowseeds.com.au">www.coorowseeds.com.au</a>
	Cory Johnston (Aust) Pty Ltd	Justin Fay	<a href="http://www.coryjohnston.com.au">www.coryjohnston.com.au</a>
	Craig Tyack Grain Trading	Craig Tyack	<a href="mailto:craig.tyack@bigpond.com">craig.tyack@bigpond.com</a>
	Defiance Maize Products Pty Ltd	Rodney Walker	<a href="http://www.corson.co.nz">www.corson.co.nz</a>
	Direct Commodities Pty Ltd	Hamish Robertson	<a href="http://www.directcommodities.com.au">www.directcommodities.com.au</a>
	East Coast Stockfeeds	Stuart Dolden	<a href="http://www.ecsf.com.au">www.ecsf.com.au</a>
	Ellerslie Free Range Farms Pty Ltd	Bruce Holden	<a href="http://www.dahall.com.au">www.dahall.com.au</a>
	ETG Processing Pty Ltd T/A Wimpak	James French	<a href="http://www.wimpak.com.au">www.wimpak.com.au</a>
	Export Import Australia	Dhanesh Kumar	<a href="http://www.exportimportaustralia.com.au">www.exportimportaustralia.com.au</a>
	Export Trading Group Australia Pty Ltd	Shayne Clark	<a href="http://www.etgworld.com">www.etgworld.com</a>
	Fanmac Logistics Pty Ltd	Chris Fanning	<a href="http://www.fanmacag.com.au">www.fanmacag.com.au</a>
	Feed Central Pty Ltd	Tim Ford	<a href="http://www.feedcentral.com.au">www.feedcentral.com.au</a>
	Findlays Barellan	Neil Findlay	<a href="http://www.findlay.world/about-us">www.findlay.world/about-us</a>
	Forest Enterprises Development & Consulting Pty Ltd	Charles Lowe	02 6662 8261
	Gold Star International Pty Ltd	Abhishek Kotkar	<a href="http://www.goldstarinternational.com.au">www.goldstarinternational.com.au</a>
	GO Resources Pty Ltd	Murray Gannon	<a href="http://www.go-resources.com.au">www.go-resources.com.au</a>
	Grainforce Pty Ltd	Derek Larnach	<a href="http://www.grainforce.com">www.grainforce.com</a>
	Grain Link WA Pty Ltd	Andrew Goyder	<a href="http://www.grainlink.com.au">www.grainlink.com.au</a>
	GrainTrend Pty Ltd	Sanjiv Dubey	<a href="http://www.graintrend.com">www.graintrend.com</a>
	Grenfell Commodities Pty Ltd	Glenn Beasley	<a href="http://www.grenfellcomm.com.au">www.grenfellcomm.com.au</a>
	GV Grain & Fodder	Joanne Harry	<a href="https://www.linkedin.com/in/joanne-harry-707119116">linkedin.com/in/joanne-harry-707119116</a>
	Hartree Partners (Australia) Pty Ltd	Daniel Miller	<a href="http://www.hartreepartners.com">www.hartreepartners.com</a>
	Harwood Grains & Stockfeeds	Paul Harwood	<a href="http://www.harwoodgrains.com.au">www.harwoodgrains.com.au</a>
	Horizon Commodities Pty Ltd	Aaron Jones	<a href="http://www.horizoncommodities.com.au">www.horizoncommodities.com.au</a>
	HX Food Group (Aus) Pty Ltd	Dong Zhao	<a href="http://www.hxfoodgroup.com.au">www.hxfoodgroup.com.au</a>
	J W Koek & Company	Brian Algate	07 3341 4548
	Kangaroo Island Pure Grain	Emma Tonkin	<a href="http://www.kipuregrain.com">www.kipuregrain.com</a>
	KB Agri Services Pty Ltd	Karl Bliss	<a href="https://www.linkedin.com/in/karl-bliss-916bb679">linkedin.com/in/karl-bliss-916bb679</a>
	Kennett Rural Services Pty Ltd	Andrew Kennett	<a href="http://www.kennetrural.com.au">www.kennetrural.com.au</a>
	Lachlan Commodities Pty Ltd	Tony Cogswell	<a href="http://www.lachlancommodities.com">www.lachlancommodities.com</a>
	Lane Grain Pty Ltd	Garry Lane	<a href="https://www.linkedin.com/in/gary-lane-82635b88">linkedin.com/in/gary-lane-82635b88</a>
	Laragon Almond Processors Pty Ltd	Mark Webber	<a href="http://www.laragon.com.au">www.laragon.com.au</a>
	Mandala Trading	Jayjeev Saraff	<a href="http://www.mandalatrading.com.au">www.mandalatrading.com.au</a>
	Marina Commodities (Australia)	Palwinder Singh	<a href="http://www.marinacommodities.com">www.marinacommodities.com</a>
	Matthews Transport and Grain Traders	Neville Matthews	<a href="https://www.linkedin.com/in/neville-matthews-aa592191">linkedin.com/in/neville-matthews-aa592191</a>
	Max Grains Pty Ltd	Jack Fahy	<a href="http://www.maxgrains.com.au">www.maxgrains.com.au</a>
	Mckenzie Ag Services	Lachlan Mckenzie	<a href="http://www.mckenzieag.com.au">www.mckenzieag.com.au</a>
	McNaughts Grain & Fertilizer Pty Ltd	Daniel Mcnaught	<a href="http://www.mcnaughts.com">www.mcnaughts.com</a>
	Melaluka Trading Pty Ltd	Simon Pritchard	<a href="http://www.melalukatradng.com.au">www.melalukatradng.com.au</a>
	Mellco Pty Ltd	Steve Mellington	<a href="http://www.mellco.com.au">www.mellco.com.au</a>
	Nandaly Grain Co-Operative	Jon Bucknall	<a href="http://www.nandalyc-co.com.au">www.nandalyc-co.com.au</a>

		Network Grains Pty Ltd	Craig Dennis	<a href="http://www.networkgrains.com.au">www.networkgrains.com.au</a>
		Northbound Trading Pty Ltd t/a WA Lupins	Daniel Marshall	<a href="http://www.walupins.com.au">www.walupins.com.au</a>
		Origin Grain Pty Ltd	Marcus Currie	<a href="http://www.origingrain.com">www.origingrain.com</a>
		Outlook Commodities	Dominic Hogan	<a href="https://facebook.com/Outlookcommodities">https://facebook.com/Outlookcommodities</a>
		Pacific Global Sprouts Pty Ltd	Prashant Kewlani	<a href="http://www.pacificglobalsprouts.com">www.pacificglobalsprouts.com</a>
		Parkinson Bros	Rohan Parkinson	<a href="https://www.linkedin.com/in/rohan-parkinson-a76a761b4">linkedin.com/in/rohan-parkinson-a76a761b4</a>
		PB Seeds	Peter Blair	<a href="http://www.pbseeds.com.au">www.pbseeds.com.au</a>
		Pearson's Grain	Darren Pearson	<a href="http://www.pearsonsgroup.com.au">www.pearsonsgroup.com.au</a>
		Peters Commodities	Michael Oxley	<a href="http://www.petcom.com.au">www.petcom.com.au</a>
		Pinnacle Grains Pty Ltd	Sonal Vij	<a href="http://www.pinnaclegrains.com.au">www.pinnaclegrains.com.au</a>
		Plum Grove	Rikki Foss	<a href="http://www.plumgrove.com.au">www.plumgrove.com.au</a>
		Pure Foods Eggs Pty Ltd	Tim Castle	<a href="http://www.purefoods.com.au">www.purefoods.com.au</a>
		QS Commodities Pty Ltd	Nick Slipper	<a href="http://www.qscommodities.com">www.qscommodities.com</a>
		Quirindi Grain & Produce	John Webster	<a href="mailto:john.webster@quirindigrain.com.au">john.webster@quirindigrain.com.au</a>
		RP Grain Pty Ltd	Gordon Pulham	<a href="http://randpcarriers.com.au/r-p-grains">randpcarriers.com.au/r-p-grains</a>
		Rural Logic (Aust) Pty Ltd	Michael Wood	<a href="http://www.rurallogic.com.au">www.rurallogic.com.au</a>
		Shannon Bros Bulk Storage Pty Ltd	Clayton Shannon	<a href="http://www.shannonbros.com.au">www.shannonbros.com.au</a>
		Silo Bag Grain (NSW QLD) Pty Ltd	Lesley Kilby	<a href="http://www.silobaggrain.com.au">www.silobaggrain.com.au</a>
		Societa Cofica Pty Ltd	Dia Ram Sharma	<a href="http://www.societacofica.com.au">www.societacofica.com.au</a>
		Southern Grain Pty Ltd	Tim Gross	<a href="http://www.southernstockfeeds.com.au">www.southernstockfeeds.com.au</a>
		Southern Grain Storage Pty Ltd	Campbell Brumby	<a href="http://www.southerngrains.com.au">www.southerngrains.com.au</a>
		Spagrimon Australia	Jiger Kotecha	<a href="http://www.spagrimon.com.au">www.spagrimon.com.au</a>
		Standard Commodities Australia Pty Ltd	Elizabeth Bozinoska	<a href="http://www.stancom.com.au">www.stancom.com.au</a>
		Sudima Australia	James Garvey	<a href="http://www.sudima.com">www.sudima.com</a>
		Sun Euro Australia	Tarun Saxena	<a href="http://www.suneuro.com.au">www.suneuro.com.au</a>
		Tamma Grains Australia Pty Ltd	Kim Packer	<a href="http://www.tammagrains.com.au">www.tammagrains.com.au</a>
		Tiller Commodities Pty Ltd	Brett Cooper	<a href="http://www.tillercommodities.com">www.tillercommodities.com</a>
		TRC International	Yohan Goonetilleke	<a href="http://www.trcglobal.com.my">www.trcglobal.com.my</a>
		Trentham Grazing Pty Ltd (t/a Godde's Grain & Fertiliser Pty Ltd)	Kim McGaw	<a href="http://www.goddesgrainandfertiliser.com.au">www.goddesgrainandfertiliser.com.au</a>
		Ulusoy Asia Pacific Pty Ltd	Mark Madjarevic	<a href="http://www.ulusoyflour.com">www.ulusoyflour.com</a>
		Universal Commodity Management	Tim Dean	<a href="http://www.commoditymanagement.com.au">www.commoditymanagement.com.au</a>
		Ward McKenzie Pty Ltd	Greg Howe	<a href="http://www.mckenziefoods.com.au">www.mckenziefoods.com.au</a>
		Waterfall Australia	Ian Mallon	<a href="mailto:ian@waterfallaustralia.com.au">ian@waterfallaustralia.com.au</a>
		Watsons Bulk	Joel Watson	<a href="http://www.wbl.net.au">www.wbl.net.au</a>
		WHG Oceania Pty Ltd	Gesheng Shen	<a href="mailto:shen@tqaj.cn">shen@tqaj.cn</a>
		Wirrinour Transport & Trading	Karl Hendy	<a href="http://www.wirrinourtransport.com.au">www.wirrinourtransport.com.au</a>
		WW Agri Pty Ltd	Steve Sloss	<a href="http://www.wagri.com.au">wwagri.com.au</a>
		ZTC Australia	Timothy Byass	<a href="http://www.ztcaus.com">www.ztcaus.com</a>
			104	
Transport Operator		Crawfords Freightlines Pty Ltd	Phillip Davis	<a href="http://www.crawfordsfreightlines.com.au">www.crawfordsfreightlines.com.au</a>
		Gehrke Grains & Transport Pty Ltd	Julian Gehrke	<a href="http://www.gehrke.com.au">www.gehrke.com.au</a>
		Hamilton Contracting (NSW) Pty Ltd	Jodie Hamilton	<a href="http://www.hamiltoncontracting.com.au">www.hamiltoncontracting.com.au</a>
		Horne Ag Logistics Pty Ltd	Jeremy Horne	<a href="http://www.horneaglogistics.com.au">www.horneaglogistics.com.au</a>
		Pacific National (NSW) Pty Ltd	Nick Ryder	<a href="http://www.pacificnational.com.au">www.pacificnational.com.au</a>
		SEAWAY Intermodal Pty Ltd	Bikash Ram	<a href="http://www.seawayintermodal.com.au">www.seawayintermodal.com.au</a>
			6	
Broker	Medium	Fox Commodities Pty Ltd	Paul Cochrane	<a href="http://www.foxcommodities.com.au">www.foxcommodities.com.au</a>
		Grain Brokers Australia	Jeff Winspear	<a href="http://www.grainbrokers.com.au">www.grainbrokers.com.au</a>
		Horizon Grain Brokers Pty Ltd	Ash Munro	<a href="http://www.horizongb.com.au">www.horizongb.com.au</a>
		Pure Grain Network Pty Ltd	Stuart Tighe	<a href="http://www.puregrain.com.au">www.puregrain.com.au</a>
		Quest Commodities Pty Ltd	Jayne Barker	<a href="http://www.questcommodities.com.au">www.questcommodities.com.au</a>
		Rain Agribusiness	Ian Grellman	<a href="http://www.rainag.com.au">www.rainag.com.au</a>
		StoneX Financial Pty Ltd	Stefan Meyer	<a href="http://www.intlfcstone.com">www.intlfcstone.com</a>
		Teague Australia Pty Ltd	Tim Teague	<a href="http://www.teague.com.au">www.teague.com.au</a>
			8	
	Sole Operator	A C Grain	Adam Clarke	<a href="http://www.acgrain.com">www.acgrain.com</a>
		Allied Grain Pty Ltd	Angus Wettenhall	<a href="http://www.alliedgrain.com.au">www.alliedgrain.com.au</a>
		Cogeser (Australia) Pty Ltd	Robert Luetolf	<a href="http://www.cogeser.com.au">www.cogeser.com.au</a>
		Farm Tender	Matt Henke	<a href="http://www.farmtender.com.au">www.farmtender.com.au</a>
		Lotema Pty Ltd	Todd Lees	<a href="http://www.lotema.com.au">www.lotema.com.au</a>
		Mallon Commodity Brokering	Ian Mallon	<a href="http://www.mcbrokering.com">www.mcbrokering.com</a>
		McDonald Pelz Australia	Stuart Richardson	<a href="http://www.mcdonaldpelz.com">www.mcdonaldpelz.com</a>
		Perkins Commodity Brokers	Craig Perkins	<a href="https://www.linkedin.com/in/craig-perkins-9a27211a">linkedin.com/in/craig-perkins-9a27211a</a>
		Woodside Commodities Pty Ltd	Hamish Steele-Park	<a href="http://www.woodcomm.com.au">www.woodcomm.com.au</a>
			9	
Corporate	Large	ASX	Ian Waddell	<a href="http://www.asx.com.au/grainfutures">www.asx.com.au/grainfutures</a>
		Australian Grain Technologies	Tristan Coram	<a href="http://www.agtbreeding.com.au">www.agtbreeding.com.au</a>
		Barrett Burston Malting Co.	Dean Ganino	<a href="http://www.bbmalt.com.au">www.bbmalt.com.au</a>
		BoortMalt Asia Pacific Pty Ltd	Simon Robertson	<a href="http://www.boortmalt.com">www.boortmalt.com</a>
		Commodity Inspection Services (Australia) Pty Ltd	Katrina Saunderson	<a href="http://www.commodityinspection.com.au">www.commodityinspection.com.au</a>
		Commonwealth Bank of Australia	Samuel Chambers	<a href="http://www.commbank.com.au">www.commbank.com.au</a>
		NSW Ports	Campbell Mason	<a href="http://www.nswports.com.au">www.nswports.com.au</a>
		Sanitarium Health Food Company	Nathan Bullock	<a href="http://www.sanitarium.com.au">www.sanitarium.com.au</a>
		Symbio Laboratories	Kristian Just	<a href="http://www.symbiolabs.com.au">www.symbiolabs.com.au</a>
			9	
	Medium	AgriDigital	Emma Williams	<a href="http://www.agridigital.io">www.agridigital.io</a>
		AgriFood Technology	Doreen Fernandez	<a href="http://www.agrifood.com.au">www.agrifood.com.au</a>
		Amspec Australia	Lee Shillock	<a href="http://www.amspecgroup.com.au">www.amspecgroup.com.au</a>
		Australian Superintendence Company (ASC)	Andrew Parry	<a href="http://www.austsupco.com.au">www.austsupco.com.au</a>

	Clear Grain Exchange	Nathan Cattle	<a href="http://www.cleargrain.com.au">www.cleargrain.com.au</a>
	Foss Pacific	Steven Ilgoutz	<a href="http://www.foss.com.au">www.foss.com.au</a>
	HFW Australia	Stephen Thompson	<a href="http://www.hfw.com">www.hfw.com</a>
	Holding Redlich	Geoff Farnsworth	<a href="http://www.holdingredlich.com">www.holdingredlich.com</a>
	Intertek	Debbrah Millard	<a href="http://www.intertek.com">www.intertek.com</a>
	Mars Petcare Australia (t/a Mars Birdcare)	Kurt Sosinski	<a href="http://www.mars.com.au">www.mars.com.au</a>
	Oldendorff Carriers Melbourne	Allen Dewhirst	<a href="http://www.oldendorff.com">www.oldendorff.com</a>
	PSC Griffith Goodall Insurance Brokers	Mandy Gladman	<a href="http://www.pscgib.com.au">www.pscgib.com.au</a>
	Qube Logistics (SB) Pty Ltd (T/A Qube Agri)	Jeremy Brown	<a href="http://www.qube.com.au">www.qube.com.au</a>
	SBA Law	Jeremy Rosenthal	<a href="http://www.sbalaw.com">www.sbalaw.com</a>
	SGS Australia	Trent Charlton-Maughan	<a href="http://www.au.sgs.com">www.au.sgs.com</a>
	T-Ports	Nathan Kent	<a href="http://www.tports.com">www.tports.com</a>
		16	
Small	Advance Trading Australasia	Andrew Woodhouse	<a href="http://www.advance-trading.com.au">www.advance-trading.com.au</a>
	Ag Scientia	Lloyd George	<a href="http://www.agscientia.com.au">www.agscientia.com.au</a>
	AgVise (WA) Pty Ltd	Shane Sander	<a href="http://www.agvise.com.au">www.agvise.com.au</a>
	Aperture Ag Pty Ltd	Alex Campbell	<a href="http://www.apertureag.com.au">www.apertureag.com.au</a>
	Basis Commodities	Chris Whitwell	<a href="http://www.basiscommodities.com">www.basiscommodities.com</a>
	BSM Global	Jason Flemming	<a href="http://www.buysellmove.com">www.buysellmove.com</a>
	Cloudbreak Grain Marketing	Ed Scamps	<a href="http://www.cloudbreak.com.au">www.cloudbreak.com.au</a>
	Delta Agribusiness	Michael Parry	<a href="http://www.deltaag.com.au">www.deltaag.com.au</a>
	E P Integrated Commodities Pty Ltd	Tracey Lehmann	<a href="http://epicbrokers.biz">epicbrokers.biz</a>
	Farmanco Marketing Pty Ltd	Donald McTaggart	<a href="http://www.farmanco.com.au">www.farmanco.com.au</a>
	FARMARCO Australia Pty Ltd	Rob Imray	<a href="http://www.farmarco.com.au">www.farmarco.com.au</a>
	Finesse Solutions	Malcolm Finlayson	<a href="http://malcolm@finessesolutions.com.au">malcolm@finessesolutions.com.au</a>
	Flexi Grain Pty Ltd	Jarrod Tonkin	<a href="http://www.flexigrain.com.au">www.flexigrain.com.au</a>
	Futari Grain Technology Services	Leah Petrie	<a href="http://www.futari.com.au">www.futari.com.au</a>
	Goldstar Commodities	Geoff Webb	<a href="http://www.goldstarcommodities.com.au">www.goldstarcommodities.com.au</a>
	Graintec Scientific	Lucas Anstiss	<a href="http://www.graintec.com.au">www.graintec.com.au</a>
	Grainx	Judi Morgan	<a href="http://www.grainx.com.au">www.grainx.com.au</a>
	Greenoaks Agriculture Pty Ltd	Richard Perkins	<a href="https://linkedin.com/in/richard-perkins-39090a3b/">https://linkedin.com/in/richard-perkins-39090a3b/</a>
	Harvestcheck Pty Ltd	Stephen Schumacher	<a href="http://www.harvestcheck.com.au">www.harvestcheck.com.au</a>
	Hay Plains Grain Storage Pty Ltd	Ron Harris	<a href="http://www.fellowsbulk.com.au/grainstorage">www.fellowsbulk.com.au/grainstorage</a>
	IKON Commodities	Ole Houe	<a href="http://www.ikoncommodities.com.au">www.ikoncommodities.com.au</a>
	Indyn	Rob Martin	<a href="http://www.indyn.net">www.indyn.net</a>
	Lachstock Consulting	Nick Carracher	<a href="http://www.lachstockconsulting.com.au">www.lachstockconsulting.com.au</a>
	Longbridge Commodities	Karen Durr	<a href="http://www.longbridge.com">www.longbridge.com</a>
	MarketAg Pty Ltd	Mark Martin	<a href="http://www.marketag.com.au">www.marketag.com.au</a>
	McMullen Consulting	Gerard McMullen	<a href="http://www.mcmullengrainagricultural.com">www.mcmullengrainagricultural.com</a>
	Mercari Pty Ltd	Daniel Marsh	<a href="http://www.mercari.com.au">www.mercari.com.au</a>
	Mirfak P/L	Mark Murphy	<a href="http://www.mirfak.com.au">www.mirfak.com.au</a>
	National Grower Register	Debbie Newmarch	<a href="http://www.ngr.com.au">www.ngr.com.au</a>
	OMIC Australia Pty Ltd	Koji Nakashima	<a href="http://www.omicaustralia.com.au">www.omicaustralia.com.au</a>
	Perten Instruments	Raul Ovelar	<a href="http://www.perten.com">www.perten.com</a>
	Pinion Advisory	Chris Heinjus	<a href="http://www.pinionadvisory.com">www.pinionadvisory.com</a>
	Planfarm Marketing Pty Ltd	Jerome Critch	<a href="http://www.planfarm.com.au">www.planfarm.com.au</a>
	Praig Marketing Pty Limited	Kevin Schwager	<a href="http://www.praig.com.au">www.praig.com.au</a>
	Primal Foods Group	Peter Longhurst	<a href="http://www.primalfoodsgroup.com">www.primalfoodsgroup.com</a>
	Profarmer and Australian Crop Forecasters	James Maxwell	<a href="http://www.nzx.com">www.nzx.com</a>
	Rise Agribusiness	Ian Dalgliesh	<a href="http://www.riseagri.com.au">www.riseagri.com.au</a>
	Saputo Dairy Australia	Ashley Denishensky	<a href="http://www.saputo.com">www.saputo.com</a>
	SGA Solutions Pty Ltd	David Hudson	<a href="https://linkedin.com/in/david-hudson-8240b913">linkedin.com/in/david-hudson-8240b913</a>
	Sizer & Cogill (t/a NQ Bulk)	Chris Sizer	<a href="http://www.sizercogill.com.au">www.sizercogill.com.au</a>
	Ten Tigers	Chris Tonkin	<a href="http://www.tentigers.com.au">www.tentigers.com.au</a>
	TE Storage & Logistics Pty Ltd	Tom Hage	<a href="http://www.testorage.com.au">www.testorage.com.au</a>
	TT Club Mutual Insurance	Rhys Richards	<a href="http://www.ttclub.com">www.ttclub.com</a>
	Ultimate Global Trading Pty Ltd	Andrew Alexopoulos	<a href="http://www.ultimategt.com.au">www.ultimategt.com.au</a>
	Wattletree Consulting	Joe Righetti	<a href="http://www.wattletree.net.au">www.wattletree.net.au</a>
		45	
International Affiliate	CIS Commodity Inspection Services	Paul Schweitzer	<a href="http://www.cis-inspections.com">www.cis-inspections.com</a>
	Grains Middle East Trading DWC-LLC	Mark Stapleton	<a href="http://www.grains-middleeast.com">www.grains-middleeast.com</a>
		2	
Industry Association	AEGIC	Courtney Draper	<a href="http://www.aegic.org.au">www.aegic.org.au</a>
	Grain Growers Limited (GGL)	Shona Gawel	<a href="http://www.graingrowers.com.au">www.graingrowers.com.au</a>
	Grain Industry Association of WA (GIWA)	Peter Nash	<a href="http://www.giwa.org.au">www.giwa.org.au</a>
	Grain Producers Australia Ltd (GPA)	Colin Bettles	<a href="http://www.grainproducers.com.au">www.grainproducers.com.au</a>
	NSW Farmers Association	Elen Welch	<a href="http://www.nswfarmers.org.au">www.nswfarmers.org.au</a>
	Stock Feed Manufacturers' Council of Australia (SFMCA)	Duncan Rowland	<a href="http://www.sfmca.com.au">www.sfmca.com.au</a>
		6	
Merchant Association	Grain Industry Association of SA	Marie Cunningham	<a href="http://www.giasa.org.au">www.giasa.org.au</a>
	Grain Industry Association of VIC (GIAV)	Colin Peace	<a href="http://www.giav.com.au">www.giav.com.au</a>
	Grain NSW	Joanne Ware	<a href="http://www.grainnsw.com.au">www.grainnsw.com.au</a>
	Queensland Agricultural Merchants (QAM)	Rob Imray	<a href="http://www.qam.org.au">www.qam.org.au</a>
		4	