

AGEC

30th April 2021

Vulnerable Supply Chain Study
Productivity Commission
Locked Bag 2, Collins St East

MELBOURNE Vic 8003

RE: Vulnerable Supply Chain Study - 2021

Dear Commissioners,

Thank you for the opportunity to make a Submission to the Productivity Commission Vulnerable Supply Chain study.

1. Executive Summary

The Australian grain industry **is one of Australia's largest** agricultural industries, with a substantial regional and export footprint and, as such, delivers significant benefit to regional and the Australian economy through export revenue, regional growth and employment.. The industry and its supply chain have managed to remain agile and resilient to numerous supply chain shocks and have weathered the increasingly disruptive and protectionist nature of international trade and geopolitics.

The grains industry will continue to provide value to the Australian economy, however, the ability to maximise opportunities and contribution will require the industry to have the tools to continue to adapt to the evolving grain market, supply chain and Australian trade landscape that is impacted through slow moving reform of competition regulation, geopolitics, trade barriers and non-tariff measures.

While the grain industry has exhibited resilience and agility to meet changing market demand and weather disruptions to its supply chains, in the view of **Grain Trade Australia's (GTA)** and the Australian Grain Exporters Council (AGEC) the international landscape has the potential for further disruption, increasing risk and vulnerability within the grain supply chain.

2. Grain Trade Australia

Grain Trade Australia (GTA) is a national association and is 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 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 Trading Standards and/or Trade Rules.

GTA has established the Australian Grain Industry Code of Practice. All GTA Members are required to adhere to the Code of Practice. GTA Members are drawn from all sectors of the grain value chain from production to domestic end users and exporters. 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.

3. Australian Grain Exporters Council

Australian Grain Exporters Council ([AGEC](#)) is a Sector Council of GTA. Sector Councils, formed by GTA members offer specialist industry groups the opportunity to meet, form policy, discuss and influence issues in their particular area of interest.

AGEC (formerly the Australian Grain Exporters Association (AGEA)) is the representative body for exporters of Australian grain and seeks to facilitate an efficient and effective export industry.

AGEC and GTA both support this Submission.

4. The Grain Industry

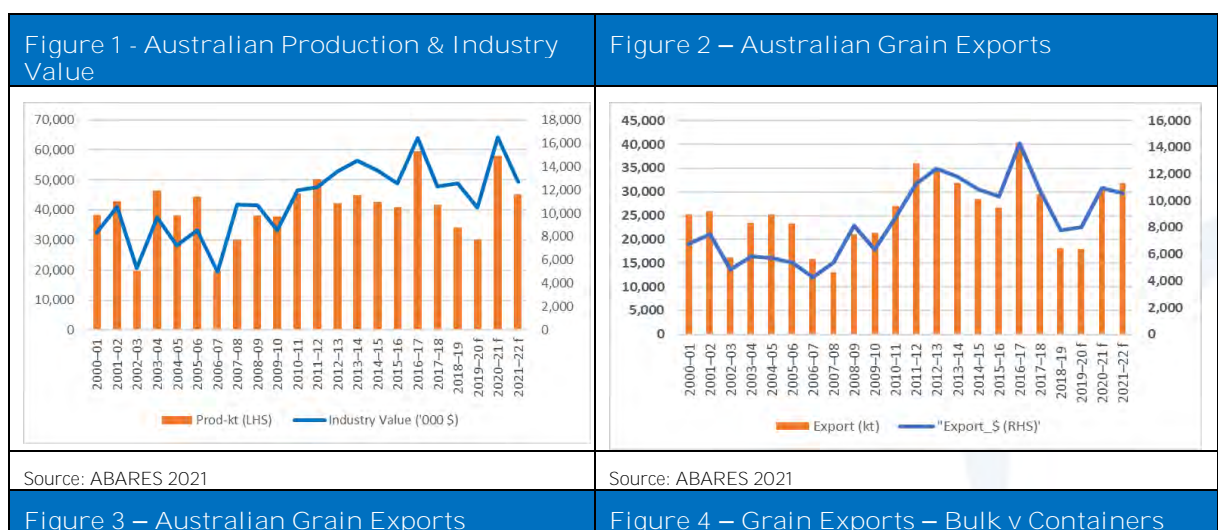
The grain industry is in Australia's top two largest agricultural sectors valued around \$16.5 billion annually. While the domestic market is the largest single consumptive home for Australian grain, over 75% of production is exported in a typical season. The industry is a large earner of foreign income, with exports valued at \$10.9 billion in 2020-21¹, as Australian exporters are forecast to ship approximately 30.4 million metric tonnes (mmt) of grain in 2020-21².

The grain industry is a critical part of Australia's rural and regional economies driving jobs and regional communities. A recent report from GRDC identified that for every \$10 million of gross value there is on average 22, 41 and 17 grain production jobs in the Northern, Southern, and Western Growing Regions respectively.

The Australian grain sector has consistently achieved productivity increases that has enabled it to remain competitive in global markets and contribute positively to the Australian economy. The industry, and its ancillary suppliers and service providers, are substantial employers, from the farm gate through to end point consumption, and particularly in rural and regional Australia.

The Asian region accounts for over 50% of exports. Wheat imports into South East Asian countries have grown twofold since 2000³. Asian demographic and economic growth are expected to see increased demand for Australian grain to 2030 and beyond. This means an efficient marketplace, investment and productivity growth across the Australian grain value chain, along with market diversification, will be crucial to maintain a competitive position in both export and domestic markets. This will be important to **Australia's economic growth**, especially to rural and regional economies.

The 5-year average Australian grain export volume is 27.2 mmt⁴. This fluctuates in response to seasonal crop production and domestic market conditions. Container exports of grain has grown and developed over the last 15-20 years to become an important component of the grain supply chain. Nationally, around 10-13% of Australian grain is now exported in containers.

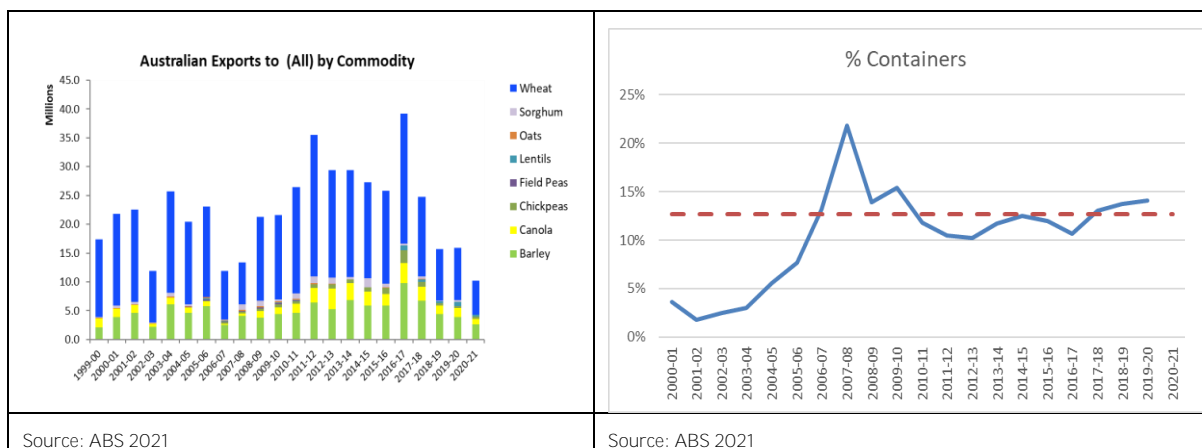


¹ ABARES (March 2021)

² ABARES (March 2021)

³ USDA PSD (April 2020)

⁴ ABARES (March 2021)



5. Focus of this Submission

GTA's and AGECE Submission focuses on three areas:

1. *Regulatory Framework* – specifically Australian competition reform in the shipping industry
2. *Non-Tariff Measures (NTMs)* – i.e. those measures that countries apply to traded goods separate to ordinary customs tariffs. NTMs are becoming more prevalent and increasingly becoming technical trade barriers for exporters
3. *Geopolitical and Covid Related Risks* - Increasing global trade tensions which is resulting in global trade tensions, greater regional volatility, political uncertainties and move to a more protectionist trade environment. Covid-19 has exposed potential vulnerabilities and risk exposures in the grain supply chain, including potential risks around supply of grain to domestic food and feed processors, as part of **Australia's** human food supply chain.

5.1 Regulatory Framework - Reform in the Shipping Industry

The global supply chain consists of multiple parties and complex interactions which impact on participants' costs. This complexity is also evident in the multiple levels of **Australia's** federal and state regulation that seek to foster **a competitive landscape for Australia's importers and exporters.**

Such complexity within the supply chain and the various levels of competition regulation has stifled reform and engendered the production of numerous reviews and reports rather than tackling market conditions and potential anti-competitive behaviours. As a general principle, GTA would encourage regulatory simplicity and consistency across jurisdictions, to optimise business efficiency, and minimise cost burden on business, thereby driving optimal value across the economy.

In contrast to the pace of the Australian government reform process, international markets are becoming increasingly dynamic and responsive to short time frames, and to the forces and pressures of political, market and economic change.

The shipping industry especially has reacted to change by becoming more concentrated as a result of mergers and global alliances. In contrast, Australian competition reform has been relatively slow and non-responsive considering the 2015 Competition Policy Review (Harper Review) called for:

- change to the Competition and Consumer Act 2010;
- the removal of the supports for ongoing special treatment of the liner shipping industry; and
- consideration of extending the review and monitoring of stevedore charges to include infrastructure charges.

Importantly, these changes were expected to provide a level of price transparency which may flow through and assist with improving the understanding of waterside cost charges including stevedore infrastructure charges.

Whilst the ACCC has issued a discussion paper on 3 December 2019 seeking comments on a possible class exemption for ocean carriers, it is noted the consultation process has been temporarily paused meaning further delay to any potential change in the competitive landscape.

5.1.1 Lack of Reform – The Impact

Australia relies on unfettered access to international markets to generate maximum value for its export industries. The current concentrated market conditions within the shipping industry increases the risk and exposure for Australian exporters to service and price related penalties.

GTA’s and AGECC members are concerned shipping lines (who are exempt from Australia’s Competition Act) may leverage this market advantage. The impact of an increase in fees (and/or service constraints), with no consideration of implications for individual supply chains, is substantially more detrimental on high volume/low value agricultural products such as grain.

In our view, any cost penalty from these market conditions will result in damage and negative **impacts on the grain industry’s ability to compete in the international market.**

Recommendation:

Governments and the ACCC should commit, as a matter of priority, to an integrated plan and timeframe that delivers appropriate regulatory reform that is aligned with the pace of change in the market environment and conditions.

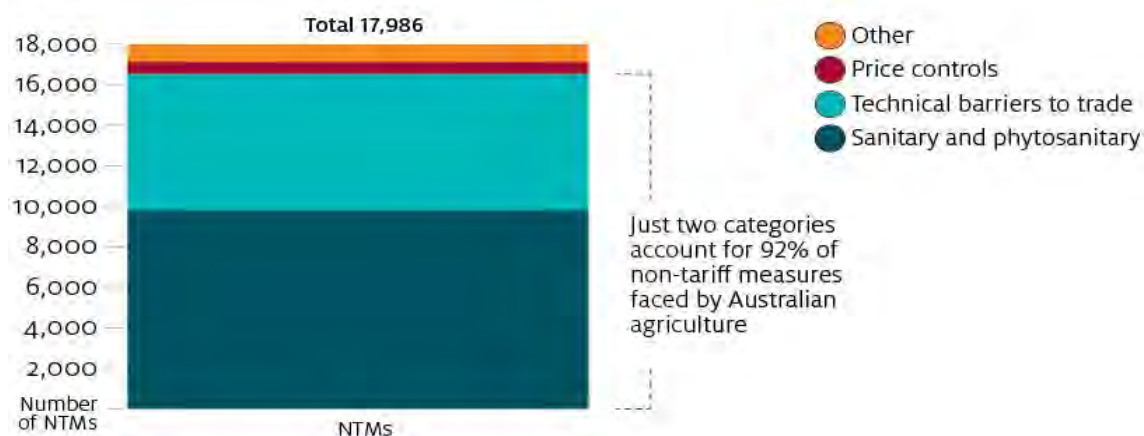
5.2 Non-Tariff Measures (NTMs)

Market access is critical for the Australian grains industry. **Australia’s grain industry is trade exposed, therefore, ensuring competitive market access is essential for its continued prosperity. Continued and improved market access is an essential part of the industry’s platform that enables it to continue providing a high-quality supply of grain, oilseeds and pulses to international customers.** With a relatively small domestic market, the export market is critically important to **the industry’s operating environment and policies affecting trade impact significantly on the industry’s export revenues.**

The focus of trade and market access has shifted as Governments have reduced traditional trade barriers e.g., tariffs through negotiation of bi-lateral and regional free trade agreements (FTA). Today, for sectors such as grains, the priority focus is on removal of NTMs or technical trade barriers (TBTs) that will facilitate trade, reduce risk and costs for exporters and avoid disruptions to trade.

Sanitary and phytosanitary measures (SPS) and technical barriers to trade (TBT) account for the majority of NTMs affecting the grains industry (refer figure 5), which reflects the scenario for Australian agricultural exports more generally as identified by ABARES (refer Figure 5).

Figure 5- Non-tariff measures affecting Australian agriculture, January 2019



NTM Non-tariff measure.
Source: UNCTAD 2019

NTMs are often legitimately imposed by Governments to protect consumers, the environment and producers by ensuring biosecurity, integrity and food safety standards. However, where NTMs act as barriers to trade they can restrict the trade of goods and add costs to producers, exporters and consumers. A NTM becomes a trade barrier when they are not based on risk or science, are used to protect domestic production, or when imposed by different countries, with different standards.

For the grains industry, SPS measures can become trade barriers where policies are based on zero tolerance or reduced limits and are increasingly influenced by emerging environmental and sustainability requirements to meet societal expectations.

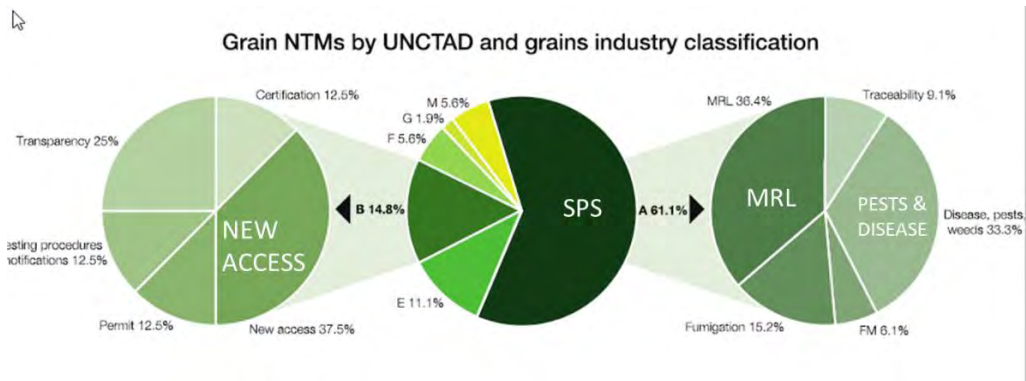
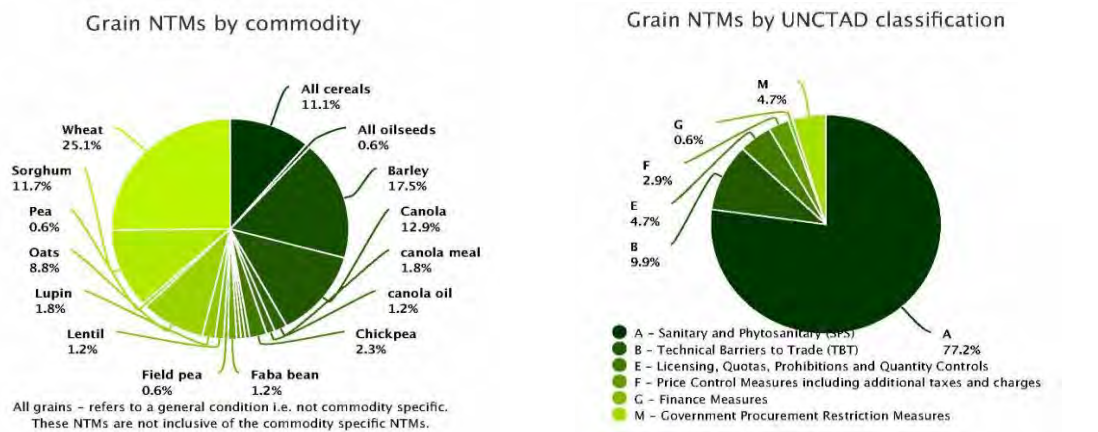
These technical barriers to trade are technical regulations and standards which can result in:

- Higher operational and commercial risk for exporters
- Increased costs (compliance, administration, and production)
- Risk of trade ban or trade restriction which could be in the form of quotas, embargoes, sanctions, levies and other restrictions

The Department of Agriculture, Water & the Environment (DAWE) works with Australia's trading partners and other government agencies, it's overseas counsellors and Department of Foreign Affairs & Trade (DFAT) diplomatic network and through the World Trade Organisation (WTO) TBT Committee to resolve NTM issues.

The grain industry has established a market access database to identify, track and respond to NTMs. This database is jointly managed by an Industry Working Group (IWG) comprising GTA, GIMAF, GGL and NWPGP. Currently there are over 100 NTMs identified (refer Figure 6).

Figure 6: Grains NTMs by commodity and classification



The grains industry recognises that addressing NTMs is challenging and requires Government and industry to work together to prioritise NTMs, develop technical solutions and negotiate outcomes. While bi-lateral approaches are important, increasingly multi-lateral dialogue and approaches to

addressing NTMs and improving transparency and predictability for trade is seen as a high priority by the grains industry.

Specifically, the grains industry has identified key areas for multi-lateral activity around digitisation of documentation to improve efficiency, minimise delays and reduce paperwork; mutual recognition, streamlining and harmonising of global/regional standards and testing methodologies; and ensuring predictable and risk based/scientifically justified regulations (e.g. MRLs, technology and innovation products among others)

Recommendation:

Industry and Government must continue to work together to prioritise NTMs, develop technical solutions through Industry /Government working groups and establish collaborative bilateral and multilateral dialogue to remove or minimise the impact of NTMs.

5.3 Geopolitical and Covid Related Risks

The success of the Australian grain industry is dependent on access to international markets and to imported inputs that are critical to crop production, supply chain operations and some domestic consumption.

GTA's mission is to “facilitate trade”. It supports and advocates for a rules-based global trade framework, based on objective scientific and risk-based assessments. GTA advocates at a domestic level with Australian state and Federal Governments, as well as at a regional/multi-lateral level and globally as an active member of the International Grain Trade Coalition (IGTC).

5.3.1 Access to Markets

Increasing global trade tensions, while creating some challenges for the sector, has also created increased awareness around the need to continually investigate and develop innovative and transformational strategies to diversify markets, and increase value added opportunities. Recent action by China in relation to barley, but also other grain commodities, has hindered access to this market, and potentially more over the longer term will give the opportunity for competitors to gain a foothold in the Chinese market. The impact of this action will extend beyond barley producers and exporters to encompass the whole grain sector by lowering prices for all other grains. As a result, the grain industry in conjunction with Government is developing a Market Diversification Strategy with a multi-commodity focus across the broader grain industry.

This proposal is aimed at developing a strategy for the grain industry to continue to build value for growers and the broader industry, diversify its markets and increase activity in target markets where there is contestable market value that the industry can capture. The strategy will assist industry and Government engagement with alternative markets, and assist the Government and industry come together to make bold changes that will support the grain industry to be strong, resilient, thriving and internationally competitive.

This strategy will complement the *Modernising the Supply Chain strategy* that GTA has developed and is working with Government to implement. This strategy is based on the premise that improving the efficiency of the grain supply chain will add value to every tonne for grain that moves through the supply chain to all markets. A copy of the *Modernising the Supply Chain Strategy* can be found [here](#).

5.3.2 Access to imported Agricultural Chemicals

Agricultural chemicals including fertiliser, insecticides, herbicides, pesticides and fungicides are critical to the Australian grain industry from both a crop yield, crop protection & quality and from a stored grain protection and phytosanitary requirement.

Crop production has increased in Australia largely driven by yield increase per unit of land through cropping practices and the use of fertiliser. Similarly, Croplife estimate that without the use of

agricultural pesticides 50% of crop yield would be lost to Fungal diseases, destructive pests and suffocating weeds.

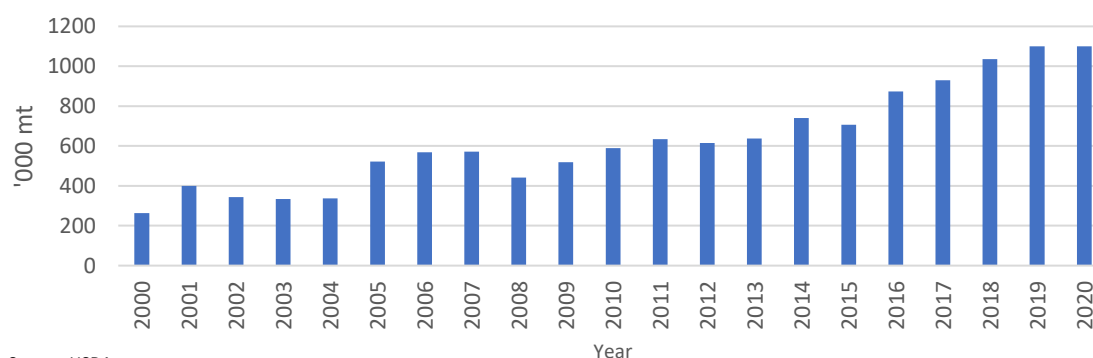
The risk that the Australian supply chain has is the large proportion of its crop inputs is imported, and a considerable proportion of that is produced in China. Given the current geopolitical climate this situation may lead to a restriction in the availability and / or the cost of crop inputs for Australian agricultural production and for the protection and the export phytosanitary requirements of stored grain.

5.3.3 Access to imported animal feed protein sources

Australia imports significant amounts of protein in the form soybean meal for inclusion in animal feed rations targeted for domestic food consumption.

The growth in soybean meal imports, predominantly from north and south American countries, has become an important component of the domestic market. Disruption or break down in this supply chain, would impact the domestic feed sector, as would have to seek protein from commodities with lower protein contents. This could be expected to increase costs and slow the rate of animal growth, leading to a slow down in the rate and level of animal production (notably pig and poultry). Thus, highlighting a vulnerability in Australia's domestic food supply chain.

Figure 7- Australian Soybean Meal Imports ('000 mt)



Source: USDA

5.3.4 Access to the Domestic Supply Chain

Access and operation of the Australian grain supply chain is critical to Australia's food supply and food security. Grain is a direct input for a significant number of consumer food products as well as a crucial input for feed rations for animal production destined for human consumption.

The grain supply chain is complex and includes:

- Farm production
- Grain storage and handling
- Transport – road, rail and ocean (bulk & containers)
- Feed and food processors
- Information Technology & Financial services (connectivity, credit & payments).

The Covid-29 pandemic has highlighted potential vulnerabilities in the grain supply chain. As part of its Covid response planning the grains industry developed an Australian Grains Supply Chain Risk Matrix (refer Appendix). The grain supply chain is vulnerable to disruptions in the flow of grain and data. Crucial to each part of the supply chain is the availability of sufficient, skilled labour at the right place and the right time. Much of the activity in the chain is physical in nature, which therefore means a dependence on labour to undertake many necessary processes. Therefore, the grain supply chain, and as a consequence Australia's food supply chain and security, is at risk to a severe escalation of Covid19 (such as seen in other parts of the world).

Investment to minimise the dependence of labour will reduce the supply chain vulnerability over time.

Recommendation

Industry and Government work together to develop and implement trade and market access strategies to grow and diversify markets for Australian grains. Further, to invest in modernising the grain supply chain to improve global competitiveness, efficiency and value of the grain moving through the supply chain, concurrently reducing risks of disruption to trade and flow of grain to food processors and consumers.

6. Conclusion

The grain supply chain consists of multiple parties and complex interactions which impact on market fairness, access and cost. Any negative interaction can create unmanageable risk, vulnerability and restrict the ability for the market to work effectively.

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

Yours faithfully,

Pat O'Shannassy
CEO, Grain Trade Australia

Lyndon Asser
Chair, Australian Grain Exporters Council

Annexed:

- List of GTA Members
- Grain supply chain Covid-19 Risk Matrix
- Modernising the Grain Supply Chain Strategy (via link)

Covid19 – Australian Grains Supply Chain Risk Matrix

Sector	Segment	Comment	Likelihood	Impact
A. Farm Production	i. Crop inputs	<ul style="list-style-type: none"> Supply Shortage of pre-crop and in-crop chemicals and fertiliser <ul style="list-style-type: none"> China is the major producer of macronutrients and Phosphate. With forced closure of industry in China and disruption to the SC there may be delays and shortages that may impact on the cropping cycle. Panic buying and hoarding are anticipated and may create localised shortages. A major increase in price for inputs may create cost/price and therefore enterprise value decisions for growers. 	Yellow	Yellow
	ii. Machinery/Operations	<ul style="list-style-type: none"> Machinery parts for repairs may be an issue as supply chains become uncertain. This is anticipated to cause isolated hardship but is not anticipated to have an industry wide impact 	Green	Green
	iii. Capital Availability/Cash Flow	<ul style="list-style-type: none"> Coming out of drought growers may require financing to move forward in the cropping cycle. Access to finances/working capital needs consideration. 	Yellow	Green
	iv. Labour	<ul style="list-style-type: none"> Farm labour in broadacre farming is minimal except for peak periods such as cropping and harvest. Given the farming environment is isolated impact on the supply of labour is not of major concern as compared to other industries and agricultural sectors. Travel restrictions may impact on labour availability in some areas, eg "backpacker" labour dependency can be high in some local regions. 	Green	Yellow
B. Storage Companies	i. Machinery/Operations	<ul style="list-style-type: none"> Like any other warehousing and bulk materials handlers, the grain storage companies are anticipating some shortage or delay in sourcing of some materials and spare parts. This is being managed and discussion have occurred between industry and govt. 	Yellow	Green
	ii. Grain Protectants	<ul style="list-style-type: none"> Phosphine and contact pesticides may be in short supply which may impact on ability to deliver/ship grain free from insects (per legislation). BHCS to progress and keep industry aware of any issues. 	Yellow	Yellow
	iii. Operating Capital/cash flow	<ul style="list-style-type: none"> Less significant issue for the larger bulk of the storage companies Significant issue for the smaller bulk of the storage companies 	Green	Green
	iv. Energy / Electricity	<ul style="list-style-type: none"> Breakdown in electricity availability is a risk to grain receipt/outturn and storage. Some sites/facilities may have on-site power, others rely on grid. Need to check on level of own-on-site generators. 	Yellow	Yellow
	v. Labour	<ul style="list-style-type: none"> Travel restrictions may impact on the availability of harvest casual labour... this may impact on the receipt process and the ability to open all grain receipt sites 	Yellow	Yellow
C. Transport - Road	i. Machinery/Operations	<ul style="list-style-type: none"> There is likely to be difficulty in sourcing parts and materials for effecting repairs on the truck fleet. 	Yellow	Yellow
	ii. Operating Capital/cash flow	<ul style="list-style-type: none"> The road industry is based on a model of low cost of entry and operates with a low capital base. Any shocks in the supply chain can have major impacts on fleet operators and especially owner drivers. Fuel price is at a record low and this is providing benefit to the fleet operators. 	Yellow	Red

Sector	Segment	Comment	Likelihood	Impact
	iii. Labour	<ul style="list-style-type: none"> Road industry is coming off a severe drought and is not well placed for further volatility Isolated inter-company labour shortages may result from Covid-19 cases. However, relief and back-up drivers may be accessible. Planning will minimise the impact of isolated pockets of infection impacting on the supply of drivers 		
	i. Machinery/Operations	<ul style="list-style-type: none"> There is likely to be difficulty in sourcing some parts and materials for the locomotive and wagon fleets. 		
	ii. Track Congestion	<ul style="list-style-type: none"> Overheated demand for other rail traffic (minerals /FMCGs) may have an impact on pathway access and priority access to locomotives and crew. 		
	iii. Operating Capital/cash flow	<ul style="list-style-type: none"> The rail industry requires a relatively large capital base and normally has in place adequate cash flow management arrangements. Issue for rail is more the return to more normal demand in 2021 and being able to re-start the supply chain. 		
	iv. Labour	<ul style="list-style-type: none"> Isolated inter-company labour shortages may result from Covid-19 cases. Rail crews coming from a drought year will already be in short supply – and will have to re-learn and up-skill on track conditions -leading to time delays Crew shortage will be an issue for grain traffic that will require management and oversight. 		
	i. Machinery/Operations	<ul style="list-style-type: none"> There is likely to be isolated issues for some fleet managers with sourcing some parts and materials for repairs and refits. 		
	ii. Demand Congestion	<ul style="list-style-type: none"> Dry Bulk Shipping at some stage is anticipated to have peaks of high demand from grain and other dry bulk product markets. This may be exacerbated due to the changeover to low sulphur fuel oil. 		
	iii. Operating Capital/cash flow	<ul style="list-style-type: none"> The shipping industry requires a relatively large capital base and normally has in place adequate cash flow management arrangements. Recent mergers and acquisitions have strengthened the survivor's whist reducing the number of players. Financial impact from other vessel fleets (especially containers) may create periods of financial pain. 		
	iv. Labour	<ul style="list-style-type: none"> Isolated inter-company labour shortages may result from Covid-19 cases. Similarly, there has been some issue with quarantine periods and crew changeovers. These are largely resolved at a state government level. However, individual Port Authorities can apply their own procedures that can lead to delays when vessels are sourced from nearby ports with less than 14 days sailing time. 		
F.	v. Export Sales Documentation	<ul style="list-style-type: none"> Reduction in air travel is creating issues with transfer of physical documents of sale and banking. Steps have been taken to revert to electronic copies until the physical documents can be provided. 		
	i. Machinery/Operations	<ul style="list-style-type: none"> Major global issues with repositioning of empty containers due to the downturn in Chinese throughput. 		
	ii. Demand Congestion	<ul style="list-style-type: none"> Similarly, the downturn in trade may create issues for global fleet managers having vessels out of position and unable to find close-by demand. 		
	iii. Operating Capital/cash flow	<ul style="list-style-type: none"> The shipping industry requires a relatively large capital base and normally has in place adequate cash flow management arrangements. However, with the unprecedented volatility this may create some financial concern and periods of financial pain. 		
	iv. Labour	<ul style="list-style-type: none"> Isolated inter-company labour shortages may result from Covid-19 cases. 		
v.	vi. Export Sales Documentation	<ul style="list-style-type: none"> Reduction in air travel is creating issues with transfer of physical documents of sale and banking. Steps have been taken to revert to electronic copies until the physical documents can be provided. 		

Sector	Segment	Comment	Likelihood	Impact
H. Domestic Food and Feed Processors	i. Machinery/Operations	<ul style="list-style-type: none"> Like any other warehousing and bulk materials handlers the domestic processor are anticipating some shortage or delay in sourcing of some materials and spare parts 	Yellow	Yellow
	ii. Grain Protectants	<ul style="list-style-type: none"> Phosphine and contact pesticides may be in short supply which may impact on ability to store grain free from insects (per legislation) ... 	Green	Green
	iii. Demand	<ul style="list-style-type: none"> Surge in demand for processed product (flour, vegetable oil, feed pellets) will require active supply chain to deliver grain to mills. Mills processing capacity, including labour availability will be risk factors, but capacity should be sufficient for stronger but “orderly” consumer demand Tight supply leading into new crop requires demand management planning by processors to ensure they do not run short. 	Red	Green
	iv. Energy	<ul style="list-style-type: none"> Breakdown in electricity availability is a risk to production capacity to meet demand. Need to check on level of own-on-site generators. 	Yellow	Red
	v. Operating Capital/cash flow	<ul style="list-style-type: none"> Increase demand will require higher levels of working capital to purchase and process grain. Issue significance varies according to scale of operations 	Yellow	Yellow
	vi. Labour	<ul style="list-style-type: none"> Labour and skills shortages could arise due to COVID19. 	Red	Red
I. Financial Markets/Trade Counterparties	i. Market Liquidity	<ul style="list-style-type: none"> Whilst most Trading companies have had recent poor periods there should be enough liquidity in the market. Demand for new crop may be volatile as other countries seek to manage any food panics. This may result in new and inexperienced players in the market. This may result in supply chain related issues and blockages 	Yellow	Red
	ii. Market Inflation	<ul style="list-style-type: none"> Food panics may result in spikes of inflation on key food items that may impact grain pricing. 	Yellow	Red
	iii. Credit	<ul style="list-style-type: none"> Credit / finance facilities may tighten by banks, creating difficulty for trade working capital, impacting ability to purchase from growers and also grain trade liquidity and credit/solvency risk for market participants 	Yellow	Red
	iv. Payments	<ul style="list-style-type: none"> Inability of banks to process documents due to self-isolation may impact and create some breakdown in Banking & Credit System, meaning Payments/Letters of Credit unable to process, payments not made, grain does not move through supply chain 	Orange	Red
	v. Connectivity	<ul style="list-style-type: none"> Pressure on the internet and other communication systems may lead to periods of outage and impact on all business activity. 	Yellow	Red

Low
Med
High

Organisation	Contact	Website /Phone
Ordinary Member (Trading)		
Level A1 (over 7 Million Tonnes)		
CBH Grain Pty Ltd	Mr Jason Craig	cbh.com.au
Glencore Agriculture Pty Ltd	Mr Philip Hughes	glencoreagriculture.com.au
		2
Level A2 (5 - 7 Million Tonnes)		
Graincorp Operations Ltd	Mr Robert Spurway	graincorp.com.au
		1
Level A3 (3 - 5 Million Tonnes)		
ADM Trading Australia Pty Ltd	Mr Darryl Borlase	adm.com
Cargill Australia Limited	Mr Erik Wibholm	cargill.com.au
		2
Level A4 (1.5 - 3 Million Tonnes)		
		0
Level B1 (1.0 - 1.5 Million Tonnes)		
Emerald Grain Pty Limited	Mr David Johnson	emeraldgrain.com
Cofco International	Ms Sara Pan	cofcoagri.com.au
		2
Level B2 (500,000 - 1 Million Tonnes)		
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.bbmalt.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
		10
Level B3 (250,000 - 500,000 Tonnes)		
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
		5
Level C1 (over 10 employees, under 250,000 Tonnes)		
Adams Australia Pty Ltd	Mr Ian Mack	adamsaustralia.com.au
Agriex Australia Pty Ltd	Mr Joseph Khnessier	02 9232 0690
Agrisk 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
Auscott Ltd	Mr Andrew Donovan	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 Ayush Rajvanshi	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 Palwinder 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
Spagicon Australia Pty Limited	Mr Jiger Kotecha	spagicon.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

#REF!

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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 Shilvock	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	basiccommodities.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.praig.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 Dalgliesh	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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