

5 February 2024

Wheat Port Code Review
Department of Agriculture, Fisheries and Forestry
GPO Box 858 Canberra ACT 2601

Via: Stephen Hodge, Director Crops Policy, Stephen.hodge@aff.gov.au

RE: Second Review of the Wheat Port Code

1.0 Introduction

Grain Trade Australia (GTA) welcomes the opportunity to provide input into the second review of the Port Terminal (Bulk Wheat) Code of Conduct known as the Wheat Port Code (WPC). These reviews are an important means for industry analysis, evaluation and discussion that supports the development, growth and the evolution of the Australian grain industry.

Such review processes, including associated submissions by industry participants and Government authorities enables considered opinions and importantly a record of the progress the market and industry has made since the inception of the WPC in 2014. The industry has changed considerably since the deregulation of Australia's wheat marketing arrangements that started with the removal of the '*wheat single desk*' in 2008.

This period has been one of immense change, challenges, and growth with the industry battling extensive droughts followed by the three recent consecutive record years of production.

As a general principle, GTA would encourage **simplicity, consistency and certainty** to optimise business efficiency, and **minimise regulatory cost burden** on consumers and business, thereby driving optimal value across the economy.

Thus, GTA believes that the longer-term direction for the industry should aim to move towards lighter touch regulation and, where possible, to **industry managed frameworks** to encourage flexibility and innovation - increasing efficiency, competition and productivity across the sector.

In GTA's view, the industry operates in a competitive commercial environment, and has demonstrated its ability to respond, innovate, and invest driving efficiency across the supply chain.

2.0 About GTA

[Grain Trade Australia](http://www.graintrade.org.au) (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 the supply chain managers, marketeers, consumers and exporters of Australia's grain. 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 provides a formal Dispute Resolution Service accessible to grains industry participants.

GTA has established the [Australian Grains Industry Code of Practice](#). This Code outlines the quality assurance process and procedures across the grain supply chain, with supplementary Technical Guideline Documents (TGDs) providing additional details. 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 280 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.

3.0 Industry Overview

The Australian grain industry has shown resilience while undergoing considerable change since deregulation of bulk wheat exports. It has evolved and adapted positively to today's environment. The industry has progressively developed an industry driven and managed framework to facilitate trade.

Today the industry is a market oriented, internationally competitive sector, with a well-deserved reputation for safe, quality grain supported by a reliable supply chain with **multiple players competing to buy and sell grain for supply to domestic and export grain processors**. Pricing for Australian grain is transparent and set through the combination of international market conditions and domestic/regional grain supply, logistic capacity and demand factors.

The Australian grain industry¹ is a major economic contributor in regional Australia and to export revenue, with the value of production in 2022/23 forecast (excluding rice) to be a record \$30.7 billion at the farm gate and \$28.3 billion of exports², meaning **the grain industry is the highest value industry in the agriculture sector**, contributing more than 33% of Australia's agricultural gross value of production annually.

The industry achieved record summer and winter production in 2022/23 of 71.7 million tonnes (mmt) following two prior large crops with 68.0 mmt in 2021/22, and 59.9 mmt in 2020/21.

Trade and an efficient supply chain is vital for the Australian grain industry and regional communities, with the Australian grain industry being highly export oriented given 65 -75% of grain production is exported.

There has been **significant increase** in Port Terminal Service Providers (PTSP) competition through private capital investment and expansion in export capacity since deregulation of wheat exports in 2008.

- In 2008 there were **18 bulk grain export terminals operated by 4 companies**.
- At the time of the WPC's commencement in September 2014, there were **23 existing bulk grain port facilities** covered by the WPC.
- In 2024 there are **32 bulk grain export terminals operated by 18 companies**, in addition to significant growth in the number of container packing facilities for export.

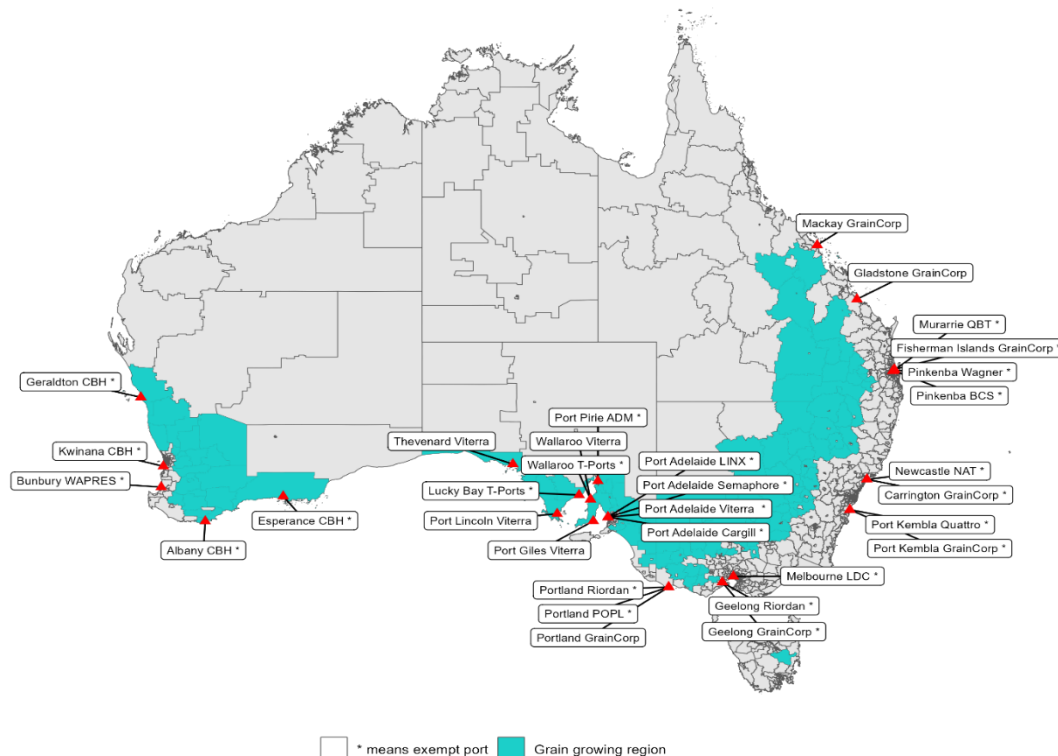
The increase in competition has been recognised by the ACCC as currently **only 7 of the 32 facilities (representing 11% of all grain exported) are required to meet the full provisions of the WPC³**.

¹ Grains include wheat, coarse grains, oilseeds, oilseed meals and pulses

² Source: ABARES, 2023

³ ACCC Submission to WPC Review, 2023

Figure 1 Map of Australia's bulk grain port terminal facilities and grain growing regions



Source: ACCC

Competition and export capacity has grown significantly through increased operational efficiency and **capital improvements by incumbents**, combined with **new investment in infrastructure** (eg port investments Bunge, NAT, Qube, T-Ports), and the significant advent of mobile bulk loaders (MBLs). Companies operating MBLs include ADM, CHS Broadbent, Cargill, Riordan Grain Services, Wilmar, and JK International. **MBLs have significantly reduced barriers to entry**, developed additional supply chains, increased competition, efficiency and flexibility across the industry.

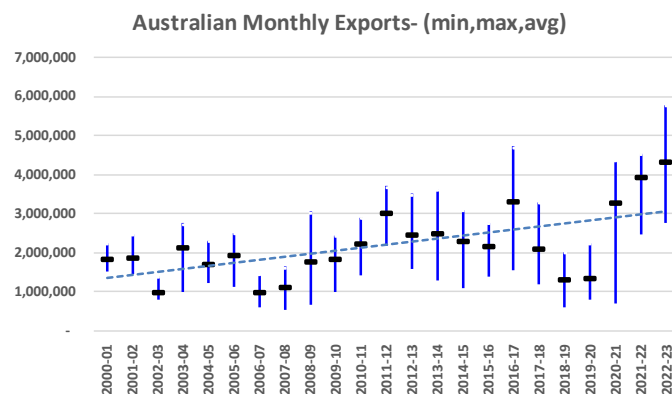
Supply chain export capacity growth has been substantial, for example:

- in 2008/9 (when wheat exports were deregulated) the maximum monthly exports were 3mmt with an average of 1.8 mmt.
- in **2022/23 the maximum monthly exports were 5.8 mmt with an average of 4.3 mmt**, this equates to a growth of 93% and 39% respectively.⁴

An important element of the increased export capacity has been derived also through investment by growers in **farm storage and transport assets**. This investment and innovation in the supply chain has resulted in the extension of the export supply chain through to the farm opening up direct trade opportunities for growers.

Figure 2 – Monthly Grain Exports

⁴ Australian Crop Forecasters, 2023



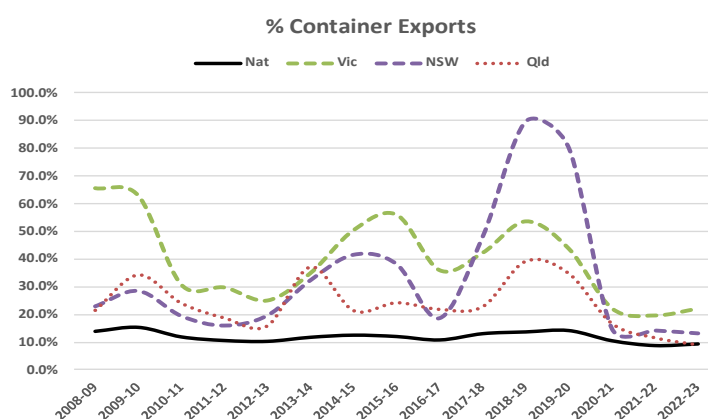
Source: ACF

There has also been significant **growth in domestic demand** since 2008 from 14mmt in 2008/09 to 17.7 mmt in 2021/22 (and peak of 18.5mmt in 2018/19)⁵. The adaptability of the industry was demonstrated with **bulk grain transshipments (ie not exported) of around 6.8 mmt** grain from SA and WA to the east coast for domestic consumption during the 2017-2019⁶ period, effectively ‘reversing’ the traditional export orientated supply chain. These shipments were not subject to the WPC regulations (as they were not exports from Australia, and much was not wheat).

This growth has led to **more domestic market competition with export markets** and led to competitive pressure on Port Terminal Service Providers (PTSP) to deliver efficient and effective services to maximise throughput in their terminals versus any competition (such as domestic market and other PTSP).

The **growth in container exports** has been another featured response in the Australian supply chain, particularly on the East Coast. For example, nationally around 10-12% of grain exports are in containers, however in Vic and NSW **depending on the season, between 20-60% of bulk grain exports can be in containers**⁷. Grain packing facilities and grain exports (including wheat) in containers are NOT regulated by the WPC.

Figure 3 – Percent of Grain exports in Containers



Source: ACF

⁵ USDA, PSD 2023

⁶ Australian Crop Forecasters, 2023

⁷ Australian Crop Forecasters, 2023

Across the value chain, the grain industry has developed processes and systems to self-regulate activities and support trade. GTA has established a range of codes and guidelines to provide transparency and certainty for industry participants, while the grower organisations have produced the Guide “Growing Australian Grain” to cover on-farm activities.

4.0 WPC Benefit versus Burden

The first review of the WPC that commenced in 2017, the subsequent Working Group Review of Recommendation 12 and subsequent ACCC monitoring reports and its most recent 2023 Submission into the second review of the WPC have all provided informative material that support the **direction towards effective industry self-regulatory frameworks**. Key learnings through these processes include:

1. There are greater numbers of port terminal service providers (PTSPs) and port terminal facilities now than when the WPC was introduced in 2014.
2. There is an increased use of novel types of infrastructure and/or business models by new entrant PTSPs (including the use of mobile ship loaders) and integration of farm storage into the export supply chains.
3. Grain exports in bulk in containers (not subject to the WPC) are an important feature of east coast grain supply chain and exports channels.
4. A level of acceptance that large vertically integrated storage, port terminal and export marketing services businesses are likely to have competitive scale advantages over smaller businesses or non-asset owning trading houses, however while codes prescribed under the Competition and Consumer Act 2010 enable industries to develop targeted regulation to raise the standard of business conduct, their purpose is not to protect smaller participants from competitive pressures that relate to bargaining power, access to markets or limited scale when purchasing (The Treasury 2017).
5. The WPC’s regulatory burden continues to increase as new PTSPs enter the market, particularly given new entrants are typically smaller-scale operators competing with large-scale operators (which are often *exempt PTSPs* – refer below).
6. Most current PTSP (25 of 32) have been granted *exempt service provider* status (ie exemption from Parts 3 to 6 of the WPC). Most, if not all, of the recent PTSP entrants have been granted *exempt service provider* status by the ACCC. This means that only 11% of grain (in 2021/22) is exported from non-exempt PTSPs.
7. Whilst competition is increasing three large vertically integrated PTSPs (CBH, GrainCorp and Viterro) remain the major providers and acquirers of bulk grain export port terminal services which the ACCC feel may give rise to some competition concerns for some industry participants. Such concerns may be able to be addressed within the Competition and Consumer Act 2010.

In GTA’s view these learnings are not conducive to extending the WPC. It would seem the WPC provides minimal benefit whilst creating burden for new PTSP entrants and therefore **GTA concurs with the ACCC view that it should be allowed to sunset in October 2024.**

5.0 Discussion - Industry Value

GTA’s vision is for an ‘*efficient and open commercial Australian grain industry*’ and is confident the Australian value chain is well placed to achieve this vision. However, we acknowledge some industry participants may still be concerned the supply chain is not fully supportive of their business objectives.

As discussed, these review processes are instructive and provide a great opportunity for industry to engage, to discuss and consider further development of **industry-driven and managed frameworks that facilitate competition and trade** across the grain value chain. This

discussion may well include the provision and sharing of PTSP information and transparency, such as shipping stems, where they are supportive of facilitating trade.

The objective of the WPC is to ensure smaller participants have some framework or arrangements to facilitate access to fair and transparent port terminal services. An alternative to the WPC regulatory approach to better support the objective could be for industry to develop a self-regulatory industry approach or model. This may leverage existing framework and governance arrangements such as GTA's Australian Grain Industry Code of Practice, Technical Guidelines, industry standard trade rules and Dispute Resolution Service.

The grain export supply chain is complex with multiple dependencies that require frameworks and process that are adaptable. An industry self-management code is more open to change and modification to meet market and supply chain variances.

An industry driven approach or model such as a Technical Guideline Document (TGD), could still include some key aspects of the Wheat Port Code, such as:

- a commitment to deal in good faith,
- shipping stem allocation principles/guidelines, and
- stem publication.

It may also seek to identify potential risks, develop mitigations and potentially reporting requirements and KPIs (if deemed necessary or useful).

Industry participants are willing to engage with Government to discuss the provision of a credible industry managed alternative to the current WPC that is of value that :

- Continues the industry de-regulation journey with an orderly and **practical approach**.
- **Reduces the regulatory burden** on industry.
- Provides **operational flexibility and efficiency**, whilst addressing key WPC objectives.
- Provides a basis for industry to collaboratively **support change**.
- Has the scope to address any industry participant concerns that are of a **sound evidentiary basis**.

GTA and industry have previously collaborated to develop the Australian Grain Industry – Code of Practice Technical Guideline Document No. 4 [Operating Standards for Pool Providers](#) and to progress the DAFF Recommendation 12 from the 2017 WPC review.

A similar Working Group approach that could include Government involvement is proposed for consideration by GTA to engage, discuss and determine what is appropriate and required to provide a credible industry managed alternative to the current WPC to ensure:

1. smaller participants have the capability to access fair and transparent port terminal services; whilst
2. recognising its purpose is not to protect smaller participants from competitive pressures that relate to bargaining power, access to markets or limited scale when purchasing.

6.0 Conclusion

The Australian grain supply chain is dynamic, market orientated and innovative. In this context GTA considers the **WPC is no longer relevant** to industry participants as it provides minimal benefit whilst creating burden for new PTSP entrants and it **should be allowed to sunset in 2024**.

Should this direction be shared by Government and industry, GTA suggests consideration be given to the opportunity for engagement to discuss the provision of a credible industry managed alternative to the current WPC.

We thank you for the opportunity to make this submission. We request that you keep us updated on developments and progress in this important review.

Please do not hesitate to contact GTA should you have any queries or require any our assistance.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'P O Shannassy'.

Pat O'Shannassy
CEO, Grain Trade Australia

Attached:

- List of GTA Members



Membership List as of 21 December 2023

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

		W B Hunter Pty Ltd	Stewart Coombes	www.wbhunter.com.au
		Wilken Grain	Richard Wilken	www.wilkens.com.au
		Woods Grain Pty Ltd	Bruce Woods	www.woodsgroup.com.au
		XLD Commodities	Paul Willows	www.xldgrain.com.au
C2			48	
		Access Grain Pty Ltd	Wade Humphries	www.accessgrain.com.au
		Aditya Birla Global Trading (Australia) Pty Ltd	Surya Jain	www.abgtrading.com
		Advantage Grain Pty Ltd	Chris Nikolaou	www.advantagegrain.com.au
		Agmark Commodities	Richard Alcorn	www.agmark.com.au
		Agri Om Australia Pty Ltd	Kishore Bulchandani	www.agriom.com.au
		Agri-Oz Exports (Aust) Pty Ltd	Francois Darcas	linkedin.com/in/francois-darcas-4a440577
		Agromin Australia Pty Ltd	Rajni Patel	www.agromin.com.au
		Arya Pulses Australia Pty Ltd	Aravindhan Ravindraraj	www.aryapulses.com.au
		A T Waterfield & Son Pty Ltd	Brad Waterfield	linkedin.com/in/brad-waterfield-8767869b
		Australian - Asian Agricultural Exports (AAAX)	Mick Connolly	www.aaax.ws
		Australian Choice Exports Pty Ltd	James Hunt	www.australianchoiceexports.com.au
		Australian Grain Storage	Matt Bailey	www.sunrice.com.au
		Australian Growers Direct Pty Ltd	Tyrone Stowers	www.ausgrowersdirect.com.au
		Australian Mungbean Company Pty Ltd	Damien White	www.australianmungbean.com.au
		Avoca Grain Storage Pty Ltd	Julie Bartlett	www.pyreneeshay.com.au
		A W Vater & Co	Kim Vater	www.vater.com.au
		Baker Grain	Richard Baker	www.bakergrain.com.au
		Boort Grain Co-Operative	Jon Bucknall	www.boortco-op.com.au
		Broun and Co Grain Pty Ltd	Charles Coventry	www.brounandco.com.au
		C & S Trading Pty Ltd	Craig Scholz	www.scholzsbh.com.au
		Carpendale Agri Pty Ltd	Andrew Kluck	www.carpendale.com.au
		Carson Stockfeed Pty Ltd	John Carson	03 6634 7376
		Chester Commodities	Richard Black	www.chestercommodities.com.au
		C K Tremlett Pty Ltd	Andrew Tremlett	linkedin.com/in/andrew-tremlett-36a06385
		CL Commodities	Robert Lean	www.clcommodities.com.au
		Coorow Seeds	Brian Pover	www.coorowseeds.com.au
		Cory Johnston (Aust) Pty Ltd	Justin Fay	www.coryjohnston.com.au
		Craig Tyack Grain Trading	Craig Tyack	craig.tyack@bigpond.com
		Defiance Maize Products Pty Ltd	Rodney Walker	www.corson.co.nz
		Direct Commodities Pty Ltd	Hamish Robertson	www.directcommodities.com.au
		East Coast Stockfeeds	Stuart Dolden	www.ecsf.com.au
		Ellerslie Free Range Farms Pty Ltd	Bruce Holden	www.dahall.com.au
		ETG Processing Pty Ltd T/A Wimpak	James French	www.wimpak.com.au
		Export Import Australia	Dhanesh Kumar	www.exportimportaustralia.com.au
		Export Trading Group Australia Pty Ltd	Shayne Clark	www.etgworld.com
		Fanmac Logistics Pty Ltd	Chris Fanning	www.fanmacag.com.au
		Feed Central Pty Ltd	Tim Ford	www.feedcentral.com.au
		Findlays Barellean	Neil Findlay	www.findlay.world/about-us
		Forest Enterprises Development & Consulting Pty Ltd	Charles Lowe	02 6662 8261
		Gold Star International Pty Ltd	Abhishek Kotkar	www.goldstarinternational.com.au
		GO Resources Pty Ltd	Murray Gannon	www.go-resources.com.au
		Grainforce Pty Ltd	Derek Larnach	www.grainforce.com
		Grain Link WA Pty Ltd	Andrew Goyder	www.grainlink.com.au
		GrainTrend Pty Ltd	Sanjiv Dubey	www.graintrend.com
		Grenfell Commodities Pty Ltd	Glenn Beasley	www.grenfellcomm.com.au
		GV Grain & Fodder	Joanne Harry	linkedin.com/in/joanne-harry-707119116
		Hartree Partners (Australia) Pty Ltd	Daniel Miller	www.hartreepartners.com
		Harwood Grains & Stockfeeds	Paul Harwood	www.harwoodgrains.com.au
		Horizon Commodities Pty Ltd	Aaron Jones	www.horizoncommodities.com.au
		HX Food Group (Aus) Pty Ltd	Dong Zhao	www.hxfoodgroup.com.au
		J W Koek & Company	Brian Algate	07 3341 4548
		Kangaroo Island Pure Grain	Emma Tonkin	www.kipuregrain.com
		KB Agri Services Pty Ltd	Karl Bliss	linkedin.com/in/karl-bliss-916bb679
		Kennett Rural Services Pty Ltd	Andrew Kennett	www.kennetrural.com.au
		Lachlan Commodities Pty Ltd	Tony Cogswell	www.lachlancommodities.com
		Lane Grain Pty Ltd	Garry Lane	linkedin.com/in/gary-lane-82635b88
		Laragon Almond Processors Pty Ltd	Mark Webber	www.laragon.com.au
		Mandala Trading	Jayjeev Saraff	www.mandalatrading.com.au
		Marina Commodities (Australia)	Palwinder Singh	www.marina.commodities.com
		Matthews Transport and Grain Traders	Neville Matthews	linkedin.com/in/neville-matthews-aa592191
		Max Grains Pty Ltd	Jack Fahy	www.maxgrains.com.au
		Mckenzie Ag Services	Lachlan Mckenzie	www.mckenzieag.com.au
		McNaughts Grain & Fertilizer Pty Ltd	Daniel Mcnaught	www.mcnaughts.com
		Melaluka Trading Pty Ltd	Simon Pritchard	www.melalukatradng.com.au
		Mellco Pty Ltd	Steve Mellington	www.mellco.com.au
		Nandaly Grain Co-Operative	Jon Bucknall	www.nandalyco-op.com.au
		Network Grains Pty Ltd	Craig Dennis	www.networkgrains.com.au
		Northbound Trading Pty Ltd t/a WA Lupins	Daniel Marshall	www.walupins.com.au
		Origin Grain Pty Ltd	Marcus Currie	www.origingrain.com
		Outlook Commodities	Dominic Hogan	https://facebook.com/Outlookcommodities
		Pacific Global Sprouts Pty Ltd	Prashant Kewlani	www.pacificglobalsprouts.com
		Parkinson Bros	Rohan Parkinson	linkedin.com/in/rohan-parkinson-a76a761b4
		PB Seeds	Peter Blair	www.pbseeds.com.au
		Pearson's Grain	Darren Pearson	www.pearsonsgroup.com.au
		Peters Commodities	Michael Oxley	www.petcom.com.au
		Pinnacle Grains Pty Ltd	Sonal Vij	www.pinnaclegrains.com.au
		Plum Grove Pty Ltd	Rikki Foss	www.plumgrove.com.au
		Pure Foods Eggs Pty Ltd	Tim Castle	www.purefoods.com.au
		QS Commodities Pty Ltd	Nick Slipper	www.qscommodities.com
		Quirindi Grain & Produce	John Webster	john.webster@quirindigrain.com.au
		RP Grain Pty Ltd	Gordon Pulham	randpcarriers.com.au/r-p-grains

		Rural Logic (Aust) Pty Ltd	Michael Wood	www.rurallogic.com.au
		Shannon Bros Bulk Storage Pty Ltd	Clayton Shannon	www.shannonbros.com.au
		Silo Bag Grain (NSW QLD) Pty Ltd	Lesley Kilby	www.silobaggrain.com.au
		Societa Cofica Pty Ltd	Dia Ram Sharma	www.societacofica.com.au
		Southern Grain Pty Ltd	Tim Gross	www.southernstockfeeds.com.au
		Southern Grain Storage Pty Ltd	Campbell Brumby	www.southerngrains.com.au
		Spagicon Australia	Jiger Kotecha	www.spagicon.com.au
		Standard Commodities Australia Pty Ltd	Elizabeth Bozinoka	www.stancom.com.au
		Sudima Australia Pty Ltd	James Garvey	www.sudima.com
		Tamma Grains Australia Pty Ltd	Kim Packer	www.tammagrains.com.au
		Tiller Commodities Pty Ltd	Brett Cooper	www.tillercommodities.com
		TRC International	Yohan Goonetilleke	www.trcglobal.com.my
		Trentham Grazing Pty Ltd (t/a Godde's Grain & Fertiliser Pty Ltd)	Kim McGaw	www.goddesgrainandfertiliser.com.au
		Ulusoy Asia Pacific Pty Ltd	Mark Madjarevic	www.ulusoyflour.com
		Universal Commodity Management	Tim Dean	www.commoditymanagement.com.au
		Ward McKenzie Pty Ltd	Greg Howe	www.mckenziefoods.com.au
		Waterfall Australia	Ian Mallon	ian@waterfallaustralia.com.au
		Watsons Bulk	Joel Watson	www.wbl.net.au
		WHG Oceania Pty Ltd	Gesheng Shen	shen@tgai.cn
		Wirrinourt Transport & Trading	Karl Hendy	www.wirrinourttransport.com.au
		WW Agri Pty Ltd	Steve Sloss	www.wagri.com.au
		ZTC Australia	Timothy Byass	www.ztcaus.com
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Transport Operator		Crawfords Freightlines Pty Ltd	Phillip Davis	www.crawfordsfreightlines.com.au
		Gehrke Grains & Transport Pty Ltd	Julian Gehrke	www.gehrke.com.au
		Hamilton Contracting (NSW) Pty Ltd	Jodie Hamilton	www.hamiltoncontracting.com.au
		Horne Ag Logistics Pty Ltd	Jeremy Horne	www.horneaglogistics.com.au
		Pacific National (NSW) Pty Ltd	Nick Ryder	www.pacificnational.com.au
		SEAWAY Intermodal Pty Ltd	Bikash Ram	www.seawayintermodal.com.au
Broker	Medium	6		
		Fox Commodities Pty Ltd	Paul Cochrane	www.foxcommodities.com.au
		Grain Brokers Australia	Jeff Winspear	www.grainbrokers.com.au
		Horizon Grain Brokers Pty Ltd	Ash Munro	www.horizongb.com.au
		Pure Grain Network Pty Ltd	Stuart Tighe	www.puregrain.com.au
		Quest Commodities Pty Ltd	Jayne Barker	www.questcommodities.com.au
		Rain Agribusiness	Ian Grellman	www.rainag.com.au
		StoneX Financial Pty Ltd	Stefan Meyer	www.intlfcstone.com
		Teague Australia Pty Ltd	Tim Teague	www.teague.com.au
	Sole Operator	8		
		A C Grain	Adam Clarke	www.acgrain.com
		Allied Grain Pty Ltd	Angus Wettenhall	www.alliedgrain.com.au
		Cogeser (Australia) Pty Ltd	Robert Luetolf	www.cogeser.com.au
		Farm Tender	Matt Henke	www.farmtender.com.au
		Lotema Pty Ltd	Todd Lees	www.lotema.com.au
		Mallon Commodity Brokering	Ian Mallon	www.mcbrokering.com
		McDonald Pelz Australia	Stuart Richardson	www.mcdonaldpelz.com
		Perkins Commodity Brokers	Craig Perkins	linkedin.com/in/craig-perkins-9a27211a
		Woodside Commodities Pty Ltd	Hamish Steele-Park	www.woodcomm.com.au
		9		
Corporate	Large	ASX	Ian Waddell	www.asx.com.au/grainfutures
		Australian Grain Technologies	Tristan Coram	www.agtbreeding.com.au
		Barrett Burston Malting Co.	Dean Ganino	www.bbmalt.com.au
		BoortMalt Asia Pacific Pty Ltd	Simon Robertson	www.boortmalt.com
		Commodity Inspection Services (Australia) Pty Ltd	Katrina Saunderson	www.commodityinspection.com.au
		Commonwealth Bank of Australia	Samuel Chambers	www.commbank.com.au
		NSW Ports	Campbell Mason	www.nswports.com.au
		Sanitarium Health Food Company	Nathan Bullock	www.sanitarium.com.au
		Symbio Laboratories	Kristian Just	www.symbiolabs.com.au
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	Medium	AgriDigital	Emma Williams	www.agridigital.io
		AgriFood Technology	Doreen Fernandez	www.agrifood.com.au
		Amspec Australia	Lee Shilvock	www.amspecgroup.com.au
		Australian Superintendence Company (ASC)	Andrew Parry	www.austsupco.com.au
		Clear Grain Exchange	Nathan Cattle	www.cleargrain.com.au
		Foss Pacific	Steven Ilgoutz	www.foss.com.au
		HFW Australia	Stephen Thompson	www.hfw.com
		Holding Redlich	Geoff Farnsworth	www.holdingredlich.com
		Intertek	Debbrah Millard	www.intertek.com
		Mars Petcare Australia (t/a Mars Birdcare)	Kurt Sosinski	www.mars.com.au
		Oldendorff Carriers Melbourne	Allen Dewhirst	www.oldendorff.com
		PSC Griffith Goodall Insurance Brokers	Mandy Gladman	www.pscggib.com.au
		Qube Logistics (SB) Pty Ltd (T/A Qube Agri)	Jeremy Brown	www.qube.com.au
		SBA Law	Jeremy Rosenthal	www.sbalaw.com
		SGS Australia	Trent Charlton-Maughan	www.au.sgs.com
		T-Ports	Nathan Kent	www.tports.com
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	Small	Advance Trading Australasia	Andrew Woodhouse	www.advance-trading.com.au
		Ag Scientia	Lloyd George	03 9598 1980
		AgVise (WA) Pty Ltd	Shane Sander	www.agvise.com.au
		Aperture Ag Pty Ltd	Alex Campbell	www.apertureag.com.au
		Basis Commodities	Chris Whitwell	www.basiscommodities.com
		BSM Global	Jason Flemming	www.buysellmove.com
		Cloudbreak Grain Marketing	Ed Scamps	www.cloudbreak.com.au
		Delta Agribusiness	Michael Parry	www.deltaag.com.au
		E P Integrated Commodities Pty Ltd	Tracey Lehmann	epicbrokers.biz
		Farmanco Marketing Pty Ltd	Donald McTaggart	www.farmanco.com.au

		FARMARCO Australia Pty Ltd	Rob Imray	www.farmarco.com.au
		Finesse Solutions	Malcolm Finlayson	malcolm@finessesolutions.com.au
		Flexi Grain Pty Ltd	Jarrold Tonkin	www.flexigrain.com.au
		Futari Grain Technology Services	Leah Petrie	www.futari.com.au
		Goldstar Commodities	Geoff Webb	www.goldstarcommodities.com.au
		Graintec Scientific	Lucas Anstiss	www.graintec.com.au
		Grainx	Judi Morgan	www.grainx.com.au
		Greenoaks Agriculture Pty Ltd	Richard Perkins	https://linkedin.com/in/richard-perkins-39090a3b/
		Harvestcheck Pty Ltd	Stephen Schumacher	www.harvestcheck.com.au
		Hay Plains Grain Storage Pty Ltd	Ron Harris	www.fellowsbulk.com.au/grainstorage
		IKON Commodities	Ole Houe	www.ikoncommodities.com.au
		Indyn	Rob Martin	www.indyn.net
		Lachstock Consulting	Nick Carracher	www.lachstockconsulting.com.au
		Longbridge Commodities	Kareen Durr	www.longbridge.com
		MarketAg Pty Ltd	Mark Martin	www.marketag.com.au
		McMullen Consulting	Gerard McMullen	www.mcmullengrainagricultural.com
		Mercari Pty Ltd	Daniel Marsh	www.mercari.com.au
		Mirfak P/L	Mark Murphy	www.mirfak.com.au
		National Grower Register	Debbie Newmarch	www.ngr.com.au
		OMIC Australia Pty Ltd	Koji Nakashima	www.omicaustralia.com.au
		Perten Instruments	Raul Ovelar	www.perten.com
		Pinion Advisory	Chris Heinjus	www.pinionadvisory.com
		Planfarm Marketing Pty Ltd	Jerome Critch	www.planfarm.com.au
		Praig Marketing Pty Limited	Kevin Schwager	www.praig.com.au
		Primal Foods Group	Peter Longhurst	www.primalfoodsgroup.com
		Profarmer and Australian Crop Forecasters	James Maxwell	www.nzx.com
		Rise Agribusiness	Ian Dalgliesh	www.riseagri.com.au
		Saputo Dairy Australia	Ashley Denishensky	www.saputo.com
		SGA Solutions Pty Ltd	David Hudson	linkedin.com/in/david-hudson-8240b913
		Sizer & Cogill (t/a NQ Bulk)	Chris Sizer	www.sizercogill.com.au
		Ten Tigers	Chris Tonkin	www.tentigers.com.au
		TE Storage & Logistics Pty Ltd	Tom Hage	www.testorage.com.au
		TT Club Mutual Insurance	Rhys Richards	www.ttclub.com
		Ultimate Global Trading Pty Ltd	Andrew Alexopoulos	www.ultimategt.com.au
		Wattletree Consulting	Joe Righetti	www.wattletree.net.au
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International Affiliate		CIS Commodity Inspection Services	Paul Schweitzer	www.cis-inspections.com
		Grains Middle East Trading DWC-LLC	Mark Stapleton	www.grains-middleeast.com
Industry Association			2	
		AEGIC	Courtney Draper	www.aegic.org.au
		Grain Growers Limited (GGL)	Shona Gawe	www.graingrowers.com.au
		Grain Industry Association of WA (GIWA)	Peter Nash	www.giwa.org.au
		Grain Producers Australia Ltd (GPA)	Colin Bettles	www.grainproducers.com.au
		NSW Farmers Association	Elen Welch	www.nswfarmers.org.au
		Stock Feed Manufacturers' Council of Australia (SFMA)	Duncan Rowland	www.sfmca.com.au
Merchant Association			6	
		Grain Industry Association of SA	Marie Cunningham	www.giasa.org.au
		Grain Industry Association of VIC (GIAV)	Colin Peace	www.giav.com.au
		Grain NSW	Joanne Ware	www.grainnsw.com.au
		Queensland Agricultural Merchants (QAM)	Rob Imray	www.qam.org.au
			4	