

20 July 2016

Standards Management
Food Standards Australia New Zealand
PO Box 5423
KINGSTON ACT 2604

Via email: submissions@foodstandards.gov.au

Dear Sir

RE: Call for submissions – Proposal P1026 – Lupin as an Allergen

I refer to the call for submissions dated 16 June 2016 regarding the proposal to regulate food containing lupin as an allergen and the request for public comment.

1. About Grain Trade Australia

Grain Trade Australia (GTA) is the focal point for the commercial grains industry within Australia. It facilitates trade and works to provide an efficient, equitable and open trading environment by providing leadership, advocacy and commercial services to the Australian grain value chain.

GTA members are responsible for over 95% of all grain storage and freight movements made each year in Australia. Over 95% of the grain contracts executed in Australia each year refer to GTA grain standards and/or trade rules.

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

A list of GTA members is attached.

Within this context, GTA provides comment on the proposed regulations relating to lupin in food.

2. Grain Standards in Australia

On behalf of industry, GTA develops and publishes the wheat and coarse grain trading standards (Standards) for the industry. GTA also distributes the Standards for oilseeds (developed by Australian Oilseeds Federation), pulses (developed by Pulse Australia) and birdseed as developed by the Queensland Agricultural Merchants.

Examples of individual commodities within these various crop groups include:

| Coarse Grains | Oilseeds | Pulses |
|---------------|-----------|------------|
| Wheat | Canola | Field peas |
| Barley | Soybeans | Faba beans |
| Sorghum | Safflower | Lupins |
| Oats | Sunflower | Lentils |
| Cereal Rye | Linseed | Chickpeas |
| Triticale | | Vetch |
| Maize | | Mung beans |

Various other Standards relating to other commodities are produced by the major participants in that industry where there is no industry organisation relevant to that commodity.

The Standards are reviewed annually by the GTA Standards Committee and circulated to industry for comment on at least two separate occasions before they are adopted in the coming season. These Standards are the basis of trade for domestic and export contracts.

It is important to bear in mind that use of GTA Standards is voluntary and GTA does not (and cannot) mandate the use of its Standards in contracts or elsewhere. The parties remain free to contract on any terms they wish (including in relation to quality and specifications) even if the contract is otherwise subject to the GTA Trade Rules. Therefore different weed seed levels may be permitted than compared to those outlined in GTA Standards. However having said this most industry participants apply the GTA weed seed tolerances.

Within the Standards for each commodity are tolerances for various contaminants such as weed seeds. The definition of a weed seed is generally described as “any other seed or commodity present that is not of the commodity being assessed”. Thus for example, lupins (all *Lupinus spp.*) are a weed seed in all commodities except lupins and various tolerances apply depending on the commodity and grade.

For example:

| Commodity | Tolerance (maximum) |
|---------------|---|
| Milling Wheat | 1 lupin/0.5L sample (in total with all other pulses) |
| Cereal Rye | 10 lupins/0.5L sample (in total with all other pulses) |
| Canola | 3% by weight of all Foreign Material (all non-canola seed material, including lupins) |
| Faba beans | 20 lupins/400 gram sample (in total with all other pulses) |

Industry standards refer to whole seeds or their equivalent in pieces. Therefore there may also be low levels of smaller lupin seed material, lupin seed coats, lupin seed coat dust etc. undetected in grain.

Note that Section 1.4 of SD2 supplied by FSANZ contains several statements regarding industry practices and standards that are not strictly correct, however these have no significant bearing on this submission or the outcomes to be achieved by industry. If clarification is required by FSANZ on these issues, please contact the undersigned.

3. Grain Quality Assessment – for Lupin Contamination

When assessing grain quality, a load of grain tendered for delivery is sampled and assessed according to industry procedures.

For practical reasons the entire load, or the entire sample taken from the load cannot be assessed. A sub-sample is taken and in the case of assessment for weed seed content, a representative 0.5L sample (cereals, oilseeds) or 200g/400g (pulses) sample is assessed for compliance with the tolerance in the respective standard for lupins.

If each sample representing the load tendered for delivery is in compliance with the relevant Standard, that load is graded accordingly. Depending on the company receiving the grain, various quality parameters of the load are documented. However for practical reasons, in the majority of instances, the level of each weed seed in a load is not assessed or recorded – this would be impractical given the time taken to conduct that assessment and the complexity and cost of developing the required recording systems.

Therefore the level of weed seeds such as lupins in each load received into a storage unit is usually not known. Similarly when grain is outturned, usually no additional assessment is done to determine the level of particular weed seeds such as lupins.

The exception to the above is where the particular weed seed is restricted in the market due to quarantine regulations or by the buyer contract. Markets with weed seed restrictions are relatively few. There are no known export markets where lupins are restricted or prohibited in grain consignments. Domestically restrictions apply to the movement of lupins interstate as a result of lupin anthracnose.

In those instances where weed restrictions apply, specific additional measures are implemented to ensure the grain meets the market requirements. These may include:

- Sampling
- Testing
- Commodity vendor Declarations
- Segregation
- Separate handling infrastructure

The grain industry in general does not have the ability to screen large tonnages of grain to remove weed seeds. In addition, due to the nature of grain growing practices (i.e., crop rotations), it is uneconomic for all grain to be grown and guaranteed totally free of lupins prior to delivery ex-farm to storages or direct to buyers.

4. The FSANZ Proposal and Implications for Grain Industry

Section S19—5 of the Food Standards Code (Code) sets maximum levels for phomopsins in lupin seeds and products of lupin seeds. Section S19—6 sets limits for the natural toxicant “Lupin alkaloids” in lupin flour, lupin kernel flour, lupin kernel meal and lupin hulls. GTA has no issues with those sections of the Code.

It is noted that the proposed approach under P1026 is *"a draft variation to the Code which will require lupin to be declared whenever present in a food in the form of:*

- *An ingredient*
- *An ingredient of a compound ingredient*
- *A food additive or processing aid (including when used as an ingredient or component of these)."*

Under the proposed approach, where lupin is not classified as above, but is known or may be known to be present in low levels, no requirement for labelling exists. This currently is the situation where other contaminants that are potential allergens, such as wheat, may be present in grain sold for human consumption.

GTA requests the same status be given to lupins. That is, no mandatory labelling or declaration unless lupins are an ingredient, food additive or processing aid.

This approach in essence is similar to the United States Food and Drug Administration approach where *"if an ingredient is present at an incidental amount and has no functional or technical effect in the finished product, then it need not be declared on the label."*


5. Summary Position

It is acknowledged that lupins may be an allergen. Industry Standards limit the level of lupins in order to meet market requirements for contamination. While GTA supports the increased use of grain commodities in the human diet, particularly so called "healthy foods such as lupins", for the various practical reasons outlined in this submission, GTA members cannot guarantee grain sold for domestic or international food consumption is totally free of lupin seed or lupin seed material.

GTA therefore supports the current FSANZ regulations in relation to the presence of allergens in food sold within Australia and the proposed approach to continue for lupins as an allergen.

GTA supports Option 3 as outlined in proposal P1026, being *"Prepare a draft variation so that a mandatory allergen declaration would be required on the label, or, where a label is not required, businesses would have to provide access to information about the presence of lupin in food being sold"*, with the supporting requirement that *"for foods that require a label, where lupin is used in food as an ingredient (or an ingredient of a compound ingredient), an additive or as a processing aid (or an ingredient or component of these), the label would have to declare the presence of lupin"*.

Thank you for consideration of this response.



Pat O'Shannassy
Chief Executive Officer

Enc.



Membership List as at 30 June 2016

| Organisation | Contact | Website /Phone |
|---|------------------------|---------------------------|
| Ordinary Member (Trading) | | |
| Level A1 (over 7 Million Tonnes) | | |
| Co-operative Bulk Handling Limited | Mr Jason Craig | cbh.com.au |
| Glencore Grain Pty Ltd | Mr Phillip Hughes | glencoregrain.com.au |
| | | 2 |
| Level A2 (5 - 7 Million Tonnes) | | |
| Cargill Australia Limited | Ms Penne Kehl | cargill.com.au |
| | | 1 |
| Level A3 (3 - 5 Million Tonnes) | | |
| ADM Trading Australia Pty Ltd | Mr Tim Henry | adm.com |
| Graincorp Operations Ltd | Mr Klaus Pamminger | graincorp.com.au |
| | | 2 |
| Level A4 (1.5 - 3 Million Tonnes) | | |
| Emerald Grain Pty Limited | Mr David Johnson | emeraldgrain.com |
| Nidera Australia Pty Ltd | Mr David Lengren | nidera.com.au |
| | | 2 |
| Level B1 (1.0 - 1.5 Million Tonnes) | | |
| Bunge Agribusiness Australia Pty Ltd | Mr Chris Aucote | bunge.com/Agribusiness |
| CHS Trading Company Australia | Mr Justin Fay | chsinc.com.au |
| Louis Dreyfus Company Australia Pty Ltd | Mr Robert Green | louisdreyfus.com.au |
| | | 3 |
| Level B2 (500,000 - 1 Million Tonnes) | | |
| Agrex Australia Pty Ltd | Mr Richard Glasson | agrexaustralia.com.au |
| George Weston Foods Limited | Mr Mark O'Brien | gwf.com.au |
| Inghams Enterprises Pty Limited | Mr Graeme Dillon | ingham.com.au |
| Plum Grove Pty Ltd | Mr Tony Smith | plumgrove.com.au |
| Ridley Agriproducts Pty Ltd | Mr Michael Reeves | agriproducts.com.au |
| Riverina (Australia) Pty Ltd | Mr Jon Mulally | riverina.com.au |
| | | 6 |
| Level B3 (250,000 - 500,000 Tonnes) | | |
| Agracom Pty Ltd | Mr Joe Hallman | agracom.com.au |
| AGRIGRAIN | Mr Jeremy Brown | agrigrain.com |
| Arrow Commodities Pty Ltd | Mr Dominic Vanzella | arrowcom.com.au |
| Australian Grain Export Pty Ltd | Mr John Thiele | 08 8832 2800 |
| Australian Grain Growers Co-operative Limited | Mr Bruce McDonald | aggcoop.com.au |
| Centre State Exports Pty Ltd | Mr Jeff Voigt | centrestateexports.com.au |
| Chinatex Australia Pty Ltd | Mr Jiling Lai | 02 9957 2688 |
| Lempriere Grain Pty Ltd | Mr Jonathan Holdsworth | lemprieregrain.com.au |
| Mitsui and Co (Australia) Ltd | Mr Kane Fukuoka | mitsui.com |
| Riordan Grain Services | Mr Bradley Hogan | riordangrains.com.au |
| Special One Grain Accumulator | Ms Jaimee Carrigan | specialonegrain.com.au |
| United World Enterprises Pty Ltd | Mr Jimmy Liu | uwetypical.com |
| Wilmar Gavlion Pty Ltd | Mr Matt Albion | 07 3713 8700 |
| | | 13 |

Ordinary Member (Trading) (contd)

Level C (under 250,000 Tonnes)

| | | |
|---|-------------------------|--------------------------------|
| A & B Grains Pty Ltd | Mr Rod Wolski | abgrains.com.au |
| A T Waterfield & Son Pty Ltd | Mr Brad Waterfield | 03 5382 3725 |
| A W Vater and Co | Mr Kim Vater | vater.com.au |
| Adams Australia Pty Ltd | Mr Ian Mack | adamsaustralia.com.au |
| Agmark Commodities | Mr Richard Alcorn | agmark.com.au |
| Agri Om Australia Pty Ltd | Mr Kishore Bulchandani | agriom.com.au |
| Agri-Oz Exports Pty Ltd | Mr Francois Darcas | 03 9830 7021 |
| Agriex Australia Pty Ltd | Mr Joseph Khnessier | 02 9232 0690 |
| Agrifoods Australia | Mr Rob Anderson | agrifoodsaustralia.com.au |
| AGT Foods Australia | Mr Peter Wilson | agtfoods.com/australia |
| All Commodities Pty Ltd | Mr Nathan Holmes | allcommodities.com.au |
| Allied Mills | Mr Simon Gelling | alliedmills.com.au |
| AMPS Agribusiness Group | Mr David Caldwell | ampsagribusiness.com.au |
| Associated Grain | Mr Todd Jorgensen | 07 4662 1999 |
| Auscott Ltd | Mr Peter Webb | auscott.com.au |
| AusiCan Commodities | Mr Palwinder Singh | ausican.com |
| Ausrealt International Pty Ltd | Mr Robin Luo | ausrealt.com.au |
| 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 Jamie Smith | ausgrowersdirect.com.au |
| Avigrain Produce | Mr Dennis Ward | avigrain.com.au |
| Baker Grain | Mr Richard Baker | bakergrain.com.au |
| Barooga Agriproducts | Mr Andrew Leighton-Daly | 03 5875 2202 |
| Berriwillock Grain Storage Co-Operative Ltd | Mr Tony Bellinger | moulameingrain.com |
| BFB Pty Ltd | Mr Terry Brabin | bfb.com.au |
| Big River Feeds Pty Ltd | Mr Bjorn Ludvigsen | 08 8532 4434 |
| Blairs Produce Company | Mr Sean Blair | 02 6025 4600 |
| Blue Ribbon Seed and Pulse Exporters | Mr Stephen Donnelly | 07 3363 8400 |
| Boort Grain Co-Operative | Mr Tony Bellinger | 03 5455 2600 |
| Broadbent Grain Pty Ltd | Mr Justin Fay | broadbentgrain.com.au |
| Broun and Co Grain Pty Ltd | Mr Wal Broun | brounandco.com.au |
| Bungulla Farming Pty Ltd | Mr Brad Jones | 08 9637 1164 |
| C & S Trading Pty Ltd | Mr Craig Scholz | scholzbh.com.au |
| C K Tremlett Pty Ltd | Mr Andrew Tremlett | 08 8524 9050 |
| Cameron Pastoral Company Pty Ltd | Ms Ross Stephens | 07 4671 4144 |
| Castlegate James Australasia Pty Ltd | Mr Dominic Hogan | castlegatejames.com.au |
| Cleveland Agriculture | Mr Chris Hurwood | 02 6756 5004 |
| Commex International Pty Ltd | Ms Mariam Boulos | 02 9531 7341 |
| Coorow Seeds | Mr Brian Pover | coorowseeds.com.au |
| COPRICE | Ms Kirsty Cutter | coprice.com.au |
| Cremer Australia Pty Ltd | Mr Brendan Macauley | cremer.de |
| DA Hall and Co | Mr Bruce Holden | 07 4695 5777 |
| Dalby Bio-Refining Limited | | dbri.com.au |
| Dalgrains (Qld) Pty Ltd | Mr Tobin Cherry | dalgrains.com |
| Darwalla Milling Co Pty Ltd | Mr Gary Heidenreich | 07 3822 0527 |
| Deacon Seeds Company | Mr Terry Deacon | 07 4662 3217 |
| Deckert Group Pty Ltd | Mr Chris Deckert | deckerts.com.au |
| Defiance Maize Products Pty Ltd | Mr Rodney Walker | corson.co.nz |
| Demeter Cormack Pty Ltd | Mr David Oates | 08 6389 0098 |
| Donnellons Bulk Haulage Pty Ltd | Mr Bill Donnellon | 0428 136 483 |
| ED & F Man Grains Australia | Mr Jon Bucknall | edfman.com |
| East Coast Stockfeed Pty Ltd | Mr Stuart Dolden | ecsf.com.au |
| Elders Grain | Mr Matthew Tolmachoff | elders.com.au |
| Export Trading Group Australia Pty Ltd | Mr Shayne Clark | etgworld.com |
| Feed Central Pty Ltd | Mr Tim Ford | feedcentral.com.au |

Level C (under 250,000 Tonnes) cont.

| | | |
|---|---------------------|--|
| Fellows Nominees | Mr Paul Fellows | fellowsbulk.com.au |
| FertInvest Pty Ltd | Mr Preyesh Barar | fertinvest.com |
| Findlays Barellan | Mr Neil Findlay | 02 6963 9246 |
| Fletcher International Exports Pty Ltd | Mr Kurt Wilkinson | fletchint.com.au |
| FREE Eyre Grain Pty Ltd | Mr Mark Rodda | free-eyre.com.au |
| Golden Harvest Grain Exports | Mr Chandru Hiremath | goldenharvest.net.au |
| Goodman Fielder Limited | Mr Alex Krzanic | goodmanfielder.com.au |
| Grain Direct Australia | Mr Lyndon Benecke | graindirect.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 |
| Grainpro Pty Limited | Ms Angela Bonfante | grainpro.com.au |
| 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 |
| Hanlon Enterprises Grain | Mr Peter Gerhardy | 02 6924 1781 |
| Hassad Australia Operations Company Pty Ltd | Mr James Carson | 02 8019 7150 |
| Iloura Resources Pty Ltd | Mr Hans Hol | iloura-resources.com |
| Independent Grain Handlers Pty Ltd | Mr Brad Bryant | igh.net.au |
| Irwin Stockfeeds | Mr Bryan Irwin | irwinstockfeeds.com.au |
| Itochu Australia Ltd | Mr Justin Swan | www.itochu.com.au |
| J K International Pty Ltd | Mr Sandeep Mohan | jki.com.au |
| J W Koek & Company | Mr Brian Algate | 07 3341 4548 |
| James Stock Feed and Fertilizer Pty Ltd | Mr Adrian Moule | jamesstockfeed.com.au |
| Jerilderie Grain Storage & Handling | Mr David Barlow | 03 5886 0344 |
| KB Agri Services Pty Ltd | Mr Karl Bliss | 07 4634 4320 |
| K M & W M Kelly & Sons | Mr Chris Kelly | kellygrains.com.au |
| 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 |
| Langdon Grain Logistics | Mr Adrian Murphy | langdongrainlogistics.com.au |
| Laragon Almond Processors Pty Ltd | Mr Mark Webber | laragon.com.au |
| Laucke Flour Mills P/L | Mr Roger Laubsch | laucke.com.au |
| LDC Enterprises Australia Pty Ltd | Mr Richard Porter | 07 3253 5999 |
| LPC Trading Pty Ltd | Mr Simon Langfield | 02 6383 7222 |
| Malteurop Australia Pty Ltd | Mr Jack King | 03 5277 1950 |
| Matthews Transport and Grain Traders | Mr Neville Matthews | 08 9831 1021 |
| Max Grains Pty Ltd | Mr Jack Fahy | maxgrains.com.au |
| MC Croker Pty Limited | Mr Greg Carroll | crokergrain.com.au |
| McNaughts Grain & Fertilizer Pty Ltd | Mr Daniel McNaught | mcnaughts.com |
| 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 |
| Mountain Industries Pty Ltd | Mr Bill Law | mountainindustries.com.au |
| Moxey Farms Pty Limited | Mr Peter Philipzen | 0407 103 158 |
| MSM Milling Pty Ltd | Mr Peter MacSmith | 02 6364 5999 |
| Murrumbidgee Grains Pty Ltd | Mr Peter Hassall | 02 6937 9100 |
| Namoi Cotton Co-Operative | Mr Shane McGregor | namoicotton.com.au |
| Nandaly Grain Co-Operative Ltd | Mr Tony Bellinger | 03 5078 1217 |
| Network Grains Pty Ltd | Mr Craig Dennis | 07 4637 8500 |
| Newcastle Agri Terminal Pty Ltd | Mr Jock Carter | 02 4962 4006 |
| Noble Resources Australia Pty Ltd | Mr Josh Taylor | thisisnoble.com |
| Northern Riverina Grains Pty Ltd | Mr Tony Bellinger | 03 5032 2553 |

Level C (under 250,000 Tonnes) cont.

| | | |
|--|---------------------|------------------------|
| OOMA Enterprises NSW Pty Limited | Mr Malcolm Berry | oomaenterprises.com.au |
| Origin Grain Pty Ltd | Mr Peter Brick | 03 5720 8500 |
| Pallinup Logistics Pty Ltd | Kevin Imberti | 0429 508 302 |
| 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 Commodities (Australia) Pty Ltd | Mr Jogesh Virk | 07 35 537 111 |
| Premium Grain Handlers P/L | Mr John Orr | pgh.com.au |
| Preston Grain | Mr Andrew Kell | 02 6977 1733 |
| Pulse Association of the South East (PASE) Inc | Ms Leanne Burr | 08 9071 3655 |
| Quadra Commodities Pty Ltd | Mr Andrew Jackson | quadra.com |
| Quirindi Grain & Produce | Mr John Webster | 02 6746 1911 |
| Regal Seed & Grain P/L | Mr Damien White | regalseed.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 |
| Robinson Grain Trading Co Pty Ltd | Mr Gary Robinson | robinsongrain.com.au |
| Roty Grain Store | Mr Brian Newman | 02 6988 8221 |
| Ruddenklau Grain Pty Ltd | Mr Tim Ruddenklau | 08 8842 1314 |
| Rural Logic (Aust) Pty Ltd | Mr Michael Wood | rurallogic.com.au |
| SANWA Pty Ltd | Mr Charles Emerson | sanwa.com.au |
| Seedhouse Tasmania | Mr Matthew Crane | seedhouse.com.au |
| Shannon Bros Bulk Haulage | 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 Ark Storage Pty Ltd | Mr Simon Pritchard | arkstorage.com.au |
| Southern Cotton Trading Pty Ltd | Mr Chris Veness | 02 69 552 779 |
| Southern Cross Agricultural Exports P/L | Mr Matthew Barnes | 0427 876 643 |
| Southern Grain Storage Pty Ltd | Mr Campbell Brumby | 03 5267 2351 |
| Southern Stockfeeds (Operations) Pty Ltd | Mr David Jemmet | 03 5437 8295 |
| Spagrimon Australia Pty Limited | Mr Jiger Kotecha | spagrimon.com.au |
| Standard Commodities Australia Pty Ltd | Mr Michael Betar | stancom.com.au |
| Sumitomo Australia Pty Ltd | Mr Tsuyoshi Osumi | sumitomocorp.com.au |
| Summer Hill Grains | Mr Barney Hughes | 0428 694 363 |
| Tasmanian Agricultural Producers Pty Ltd | Mr David Skipper | tasagproducers.com.au |
| TSS Grain | Mr Trevor Macleod | tasstockfeed.com.au |
| Thallon Grains Pty Ltd | Mr Andrew Earle | 02 6756 5004 |
| Twynam Pastoral Company | Ms Lesley Heidtman | twynam.com |
| Unigrain Pty Ltd | Mr Ervin Leong | unigrain.com.au |
| Unique Grain Management Pty Ltd | Mr Mark Thiele | uniquegrain.com.au |
| W B Hunter Pty Ltd | Mr Stewart Coombes | 03 5821 5744 |
| Ward McKenzie Pty Ltd | Mr Mal Parkhill | mckenziefoods.com.au |
| Whitty Produce | Ms Marsha McMonigle | 03 5721 6588 |
| Whyalla Beef Pty Ltd | Mr Gino De Stefani | whyallabeef.com.au |
| Wilken Grain | Mr Richard Wilken | wilkens.com.au |
| Wimpak Export Company Pty Ltd | Ms Jo Cameron | wimpak.com.au |
| XLD Grain Pty Ltd | Mr Lachie Stevens | xldgrain.com.au |
| Yenda Prods Grain Pty Ltd | Mr Luke Mancini | 0437 512 322 |

161**Transport Operator**

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|-------------------------------------|------------------|-------------------|
| Gehrke Grains and Transport Pty Ltd | Mr Julian Gehrke | 07 5465 6695 |
| Wakefield Grain Export Services | Mr John Gray | wakefields.com.au |

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Broker

Large

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Medium

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|---------------------------------|---------------------|-----------------------|
| Allied Grain Pty Ltd | Mr Angus Wettenhall | alliedgrain.com.au |
| Brightcom Australia Pty Ltd | Mr Simon Robertson | 03 9591 6300 |
| Cereal Milling Services Pty Ltd | Mr Michael Moss | 02 4323 9339 |
| Fox Commodities | 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 | Mr Tom Roberts | igrain.com.au |
| INTL FCStone Pty Ltd | Mr Brett Cooper | 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 |
| ACCB Australia | Mr Andy Cunliffe | 0455 105 300 |
| AgLink - CMS | Mr Justen Schofield | aglinkcms.com.au |
| Cogeser (Australia) Pty Ltd | Mr Robert Luetolf | cogeser.com.au |
| Farm Tender | Mr Matt Henke | farmtender.com.au |
| Knight Commodities | Mr Chris Groat | 07 4671 5221 |
| Mallon Commodity Brokering | Mr Ian Mallon | mcbrokering.com |
| Quest Commodities Pty Ltd | Ms Jayne Barker | questcommodities.com.au |
| Shearwater International Pty Ltd | Mr Don Cattanch | 07 3324 9088 |
| Wimmera Mallee Grain Services | Mr Rodney Edgerton | egrainservices.com.au |
| Woodside Commodities Pty Ltd | Mr Hamish Steele-Park | woodcomm.com.au |

11

Corporate

Large

| | | |
|---|--------------------|-------------------------|
| ASX Limited | Mr Kristen Hopkins | asx.com.au/grainfutures |
| Australia And New Zealand Banking Group | Mr Ian Hanrahan | anz.com.au |
| Australian Grain Technologies Pty Ltd | Mr Steve Jeffries | agtbreeding.com.au |
| Commonwealth Bank of Australia | Mr Tom Barraket | commbank.com.au |
| Symbio Laboratories | Ms Elizabeth Owens | sybiolabs.com.au |

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Medium

| | | |
|---|---------------------|----------------------------|
| Agfarm Pty Ltd | Mr Ron McCalman | agfarm.com.au |
| Agrifood Technology Pty Ltd | Ms Doreen Fernandez | 03 9742 0589 |
| Agrisk Management Pty Ltd | Mr Brett Stevenson | 02 9499 4199 |
| Australian Superintendence Company | Mr Andrew Parry | 07 3391 8640 |
| Commodity Inspection Services (Australia) Pty Ltd | Mr Mathew Conoulty | commodityinspection.com.au |
| Foss Pacific Pty Ltd | Mr Simon Kirkman | foss.com.au |
| Holding Redlich | Mr Geoff Farnsworth | holdingredlich.com |
| Holman Fenwick Willan | Mr Stephen Thompson | hfw.com |
| Intertek | Mr Lee Shilvock | intertek.com |
| Merricks Capital Pty Limited | Mr Adam Davis | merrickscapital.com |
| NZX Australia (CGX, ACF, PFA) | Mr Nathan Cattle | nxz.com |
| SBA Law | Mr Jeremy Rosenthal | sbalaw.com |
| SGS Australia Pty Ltd | Mr Scot Paterson | au.sgs.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 |
| AvantAgri Australia Pty Ltd | Mr Peter Woods | avantagri.com.au |

Corporate - Small (cont)

CloudBreak Grain Marketing Pty Ltd
Basis Commodities Pty Ltd
Delta Agribusiness Pty Ltd
Direct Commodities Pty Ltd
EP Integrated Commodities Pty Ltd
Farmanco Marketing Pty Ltd
FarMarCo Australia Pty Ltd
Finesse Solutions Pty Limited
Flexi Grain
Goldstar Commodities
Grain Storage Solutions
Grainx
HarvestCheck Pty Ltd
Hay Plains Grain Storage Pty Ltd
IKON Commodities Pty Ltd
JBS Australia
MarketAg Pty Ltd
McMullen Consulting Pty Ltd
Mirfak P/L
Murray Goulburn Trading Pty Ltd
OMIC Australia Pty Ltd
Pertin Instruments Australia Pty Ltd
Peter McQueen Pty Limited
Pinnacle Commodities Pty Ltd
Planfarm Marketing Pty Ltd
Primal Foods Group
Rural Directions Pty Ltd
SGA Solutions Pty Ltd
TE Storage & Logistics Pty Ltd
Ten Tigers

Mr Ed Scamps 08 8388 8084
Mr Chris Whitwell basiscommodities.com.au
Mr Michael Parry 02 6772 0000
Mr Hamish Robertson directcommodities.com.au
Ms Tracey Lehmann 08 8627 2304
Mr Donald McTaggart farmanco.com.au
Mr Robert Imray 07 4637 6400
Mr Malcolm Finlayson 02 9872 9270
Mr Jarrod Tonkin flexigrain.com.au
Mr Geoff Webb goldstarcommodities.com.au
Mr Kerry Miles grainstoragesolutions.com.au
Mr Chris Hood grainx.com.au
Mr Stephen Schumacher 0418 199535
Mr Ron Harris 0404 444 600
Mr Simon Clancy ikoncommodities.com.au
Mr Richard Nicholls jbsa.com.au
Mr Mark Martin 02 6747 1590
Mr Gerard McMullen 03 8300 0108
Mr Mark Murphy mirfak.com.au
Mr Gerard Murphy 03 5862 2799
Mr Yasuhide Okumura omicaustralia.com.au
Mr Raul Ovelar 02 9870 3400
Mr Peter McQueen petermcqueen.com
Mr Rod Buckle pinnaclecommodities.com.au
Mr Jerome Critch planfarm.com.au
Mr Peter Longhurst 02 8011 4182
Mr Chris Heinjus ruraldirections.com
Mr David Hudson 03 5428 4990
Mr Tom Hage 08 8762 2188
Mr Chris Tonkin tentigers.com.au

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International Affiliate

CIS - Commodity Inspection Services

Mr Paul Schweitzer

cis-inspections.com

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Industry Association

Grain Growers Limited
Grain Industry Association of WA
Grain Producers Australia Ltd
NSW Farmers Association
Victorian Farmers Federation

Ms Alicia Garden
Ms Larissa Taylor
Mr Andrew Weidemann
Mr Justin Crosby
Mr Stephen Sheridan

graingrowers.com.au
giwa.org.au
grainproducers.com.au
02 8251 1827
03 9207 5555

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Merchant Association

Grain Industry Association of SA
Grain Industry Association Of Victoria
Grain NSW Inc
Queensland Agricultural Merchants Inc.

Mr Tim Mee
Mr Colin Peace
Ms Joanne Ware
Mr John Francis

08 8395 3572
giav.com.au
grainnsw.com.au
qam.org.au

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Life Members

Mr Mervyn May
Mr Christopher Kelly

Retired
K M & W M Kelly & Sons

Appointed
Appointed July 2015

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