

18th July 2024

Department of Infrastructure, Transport, Regional Development, Communications and the Arts
Department of Climate Change, Energy, the Environment and Water.
PO Box 6021
Parliament House
CANBERRA ACT 2600

Attention: Consultation Secretariat – Via ‘*Have your Say*’ submission portal

Low Carbon Liquid Fuels Consultation

Submission from Grain Trade Australia

1. About GTA

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 (including the Australian Grain Industry Code of Practice) across industry to facilitate and promote the trade of 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 Trade Rules.

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 [here](#) and attached.

GTA welcomes the opportunity to make this submission to the consultation on Low Carbon Liquid Fuels (LCLF).

2. Introduction

The Australian grain industry¹ is a major economic contributor in regional Australia and to export revenue, with grain industry value in 2023/24 estimated to be \$43.6 billion and \$22.1 billion of exports², meaning the grain industry is one of the highest value industries in the agricultural sector, contributing more than 25% of **Australia’s** gross value of agricultural production.

The summer and winter crop production in 2023/24 is forecast at 51 million tonnes following three prior record large crops with 2021/22 a 68.0 million tonnes, 59.9 million tonnes in 2020/21 and 73.6 million tonnes in 2022/23³.

Trade, and the grain industry supply chain is vital for the Australian grain industry and regional communities, with the industry well positioned to supply markets especially into regions such as south east Asia. This supply chain is heavily reliant on (currently imported) liquid fuels. GTA supports the development of sustainable and renewable fuels as part of the carbon transition.

3. Current Australian Market

The capacity for farmers to alternate between different crops and enterprises within their business is fundamental to them managing risk.

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

² Source: ABARES, 2024

³ Source: ABARES, 2024

Figure 1 illustrates notable movement in farm enterprises since 1993 from sheep to cropping enterprises.

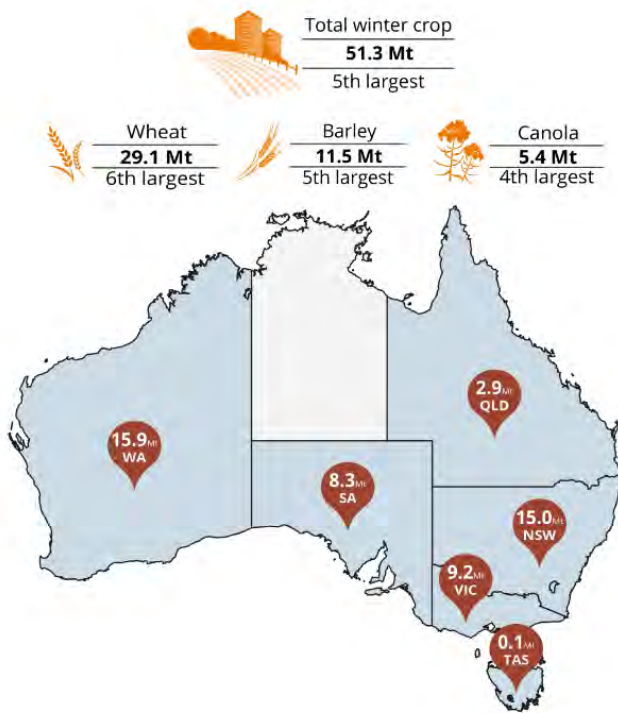
Figure 1: Substitution between Sheep and Cropping enterprises



Source: ABARES, MLA

Within grain cropping enterprises, in addition to agronomic factors, changing market and environmental factors will influence the grain crops and varieties grown. Australian farmers have choices on what they produce on the land available. ABARES forecast for 2024/25 Canola production of 5.4 million tonnes (Mt), 10% of the total winter crop.

Figure 2. Australian Winter Crop Production, 2024-25



Source: ABARES

Australian canola is sought after globally for its use as a food-grade oil, for biofuel production and as a stock feed. Australian canola production is on the rise, averaging more than three million metric tonnes annually, making up 15–20 per cent of the world’s export trade⁴.

Canola is well known for producing one of the world’s healthiest vegetable oils and its importance as an environmentally friendly biofuel is growing. Australian canola is grown using sustainable farming systems and can be certified as meeting sustainability criteria for market access to Europe for use in biofuel. As a

⁴ AEGIC 2024

result, Australia is a major supplier of canola to the European Union (EU) biodiesel market with over 1.8mmt exported annually to the EU.

Australian farmers produce both GM and GM-free canola. The Australian grain supply chain is experienced with segregating and managing distribution to the market of these products through the industry agreed Market Choices Framework managed by GTA.

4. Impact on the Grain Market of an Australian LCLF Industry

The Australian grain supply chain is sophisticated, market driven and has demonstrated its responsiveness to changes in supply, supply chain shocks and market demands. GTA members facilitate the trade of grain within Australia to numerous domestic demand points and to approximately 100 export market destinations through either trade in containers or in bulk vessels.

Australia exports around 70-75% of grain production each year into a globally competitive market, as illustrated in figure 4 below. As such the industry is cognoscente of the impacts in terms of costs and higher risk of trade barriers (tariff and non-tariff), government policy and political intervention (including subsidies) in many countries and their impact on efficient global trade. As such the Australian grain industry has a firm view and advocates strongly for risk, science and rules based global trade.

The introduction of LCLF refineries, aside from the benefits in the production of sustainable fuels, is also welcomed from a grain market perspective. LCLF refineries should create new demand points for Australian grain and domestic grain trade opportunities. The Australian grain supply chain has both a domestic and export market focus and is experienced in managing the demands and commercial tensions of domestic grain consumers. The domestic demand for grain has grown significantly over the previous decades, with 5-year average demand of 17.3 million tonnes and a maximum of 18.8 million tonnes in 2019-20⁵. Demand points are generally more concentrated on the east coast.

Figure – 3 – Domestic Grain Demand (MT)

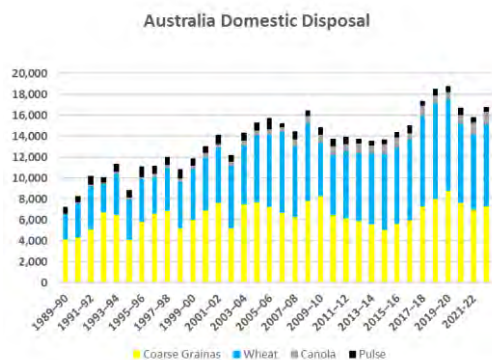
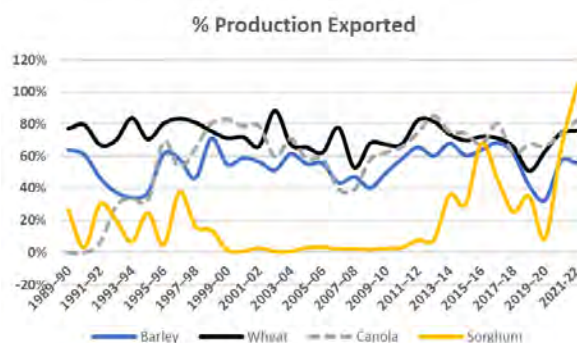


Figure 4 – Percent of Australian grain production exported



Domestic consumers include flour millers, starch processors, oil seed crushers and processors, barley maltsters, stock feed processors/manufacturers and whole grain feed buyers. Companies purchasing grain for domestic consumption in years of average production and above have ample access to grain supply and can purchase grain to meet their requirements. They achieve this by offering prices for grain commensurate with the export price parity.

Domestic consumers need to at least match the Australian seaport price offerings from international customers. Consumers that have specific grain requirements (e.g. Milling Oats) also need to consider at planting time farmers have a choice of which grains to grow to maximise the yield/price versus production cost ratio and also what farming enterprise maximises value. Price incentives above export parity may be required to ensure commercial production of some crop types.

The Australian grain market is one of the most unfettered grain commodities markets in the world with minimal subsidies across the industry. Introduction of additional demand from LCLF production is welcome

⁵ ABARES 2024

and should enhance the grain market. However, should the Government consider policy settings such as mandates, domestic reservations or tariffs, GTA members respectfully request these be confined to the LCLF production. There should be no material change to the policy settings and conditions as to way the Australian grain market now operates. To do so, would adversely impact on market efficiency, national economic productivity and trade facilitation. Further it may potentially impact on **Australia's** global credibility and reputation as a strong advocate for risk and science based global trade rules, with minimal government and political intervention.

5. Supply Chain Benefits

Australian industry participants and especially its exporters are fully exposed to a sophisticated global commodity market for grain that is competitive, efficient, and transparent. Additional domestic consumptive demand for canola and other biomass is of benefit to the Australian grain value chain and the environment. Grain consumed domestically can remove or reduce the transport leg from up-country production and storage to the seaport terminal and the ocean freight leg to the international market. As international shipping is a notable **contributor to the world's greenhouse gas emissions**, additional Australian domestic grain demand, particularly for canola, is beneficial to efforts to reduce greenhouse gas emissions.

Domestic consumption is also beneficial to grain marketers as it also removes international trade and market access risks. Australian grain exporters face risks and challenges including the sovereign risk of the importing country and counterparty risk of the importing firm, together with other trade impediments including both import country tariffs and non-tariff measures. A recent example is the imposition by China **of 80.5 per cent tariffs on barley in May 2020 effectively halting the trade flow of barley to Australia's largest market**. This included financial impact on exporters who had purchased significant barley tonnage from growers at harvest, and consequential financial losses as they had to sell to lower paying markets, once access to the premium China market closed.

Phytosanitary and chemical (maximum) residue limit risk associated with international trade are also reduced, as is the trade administrative complexity and burden.

6. Supply Chain Investment for Competitiveness and Growth

The future **success of Australia's grain industry** is dependent on an efficient and competitive supply chain. To this end GTA has developed an innovative growth and investment strategy for the grain supply chain called [Modernising the grain supply chain](#). This strategy is set out with four strategic pillars focussing on:

- skills and capability
- quality and market access
- technology
- transport and logistics.

Australia must compete and develop competitive advantage on both the grain quality/value and the domestic and export supply chain fronts. GTA would contend that in seeking to develop policy to potentially support the introduction of LCLF production factors such as the efficiency of the grain supply chain, should also be considered to improve competitiveness and extract economic benefits for all participants, including rural and regional economies.

Enhancing the competitiveness of the LCLF value chains will benefit both industry and government by increasing the LCLF value proposition and its ability to source grain.

7. Technology Innovations

New technology available and being developed in plant breeding innovation has the potential to play a major role in helping the industry meet the demands of food, feed and industrial grain consumers. Whilst having the potential to contribute to positive outcomes for governments, farmers, consumers and the environment, additionally in our view there needs to be a balance to ensure there is no detrimental impact or disruption to trade.

Accordingly, GTA through its [Grain Industry Stewardship Framework for New Technologies](#) is aiming to work with all parties across the grain value chain to develop a collaborative approach to:

1. Ensure the facilitation of trade, market access and reputation with support and adoption of innovative breeding technology.
2. Promote information sharing on technologies being developed for commercial application in the grain industry to avoid/minimise any trade disruption; and
3. Establish criteria, certification and supporting frameworks for technology (such as machine learning) is beneficially utilised in the grain supply chain.

New chemicals are also an important tool for the production of feedstock for LCLF. As Australia relies heavily on the export market for grain, and therefore the confidence of the importing country regulators and consumers in Australia's product and supply chain processes, it takes a science and risk based, and cautious, approach to adopting chemicals.

Potential new crops under market consideration such as carinata and cover cress have the potential to be considered as feedstocks for LCLF use. The introduction of these crops relies on chemical options being available to grain producers. Prioritisation to review these chemicals by government will be of benefit.

8. Conclusion

GTA supports the government review, and the potential introduction of LCFL production in Australia. Creating new domestic demand opportunities for Australian grain is of benefit to the industry and the broader economy.

However, any new domestic consumption points must have equal and not preferential access to the existing grain trading market.

In its review Government should also consider aspects of the supply chain and new technologies to maximise the value and performance of the proposed LCLFs.

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 should we be able to be of assistance.

Yours faithfully,



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CEO, Grain Grade Australia

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		J K International Pty Ltd	Sandeep Mohan	www.jki.com.au
		Ridley Agriproducts	Reagan Stroud	www.agriproducts.com.au
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		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
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		Southern Grain Storage Pty Ltd	Campbell Brumby	www.southerngrains.com.au
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		Hamilton Contracting (NSW) Pty Ltd	Jodie Hamilton	www.hamiltoncontracting.com.au
		Horne Ag Logisitics Pty Ltd	Jeremy Horne	www.horneaglogistics.com.au
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		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	
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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	
		CIS Control Union Australia	Mathew Conoulty	cis-controlunion.com	
		Commonwealth Bank of Australia	Tom Morgan	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 Weston	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	Rod Gleeson	www.foss.com.au	
		HFW Australia	Stephen Thompson	www.hfw.com	
		Holding Redlich	Geoff Farnsworth	www.holdingredlich.com	
		Intertek	Debrah 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.pscgib.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	www.agscientia.com.au		
	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	Ben Langford	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	Josh Whelan	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 Heijus	www.pinionadvisory.com		
	Planfarm Marketing Pty Ltd	Jerome Critch	www.planfarm.com.au		
	Priag Marketing Pty Limited	Kevin Schwager	www.priag.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
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Industry Association		AEGIC	Courtney Draper	www.aegic.org.au
		Grain Growers Limited (GGL)	Shona Gawel	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 (SFMCA)	Duncan Rowland	www.sfmca.com.au
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Merchant Association		Grain Industry Association of SA	Marie Cunningham	www.giasa.org.au
		Grain Industry Association of VIC (GIIV)	Colin Peace	www.giiv.com.au
		Grain NSW	Joanne Ware	www.grainnsw.com.au
		Queensland Agricultural Merchants (QAM)	Rob Imray	www.qam.org.au
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