

Grain Trade Australia Limited PO Box R1829 Royal Exchange NSW 1225

Phone: +61 2 9235 2155 Email: admin@graintrade.org.au

Web: www.graintrade.org.au

3rd May 2023

Assistant Secretary Advice and Investment Branch The Treasury **Langton Crescent** Parkes ACT 2600

Via email: FinancialAdvice@treasurv.gov.au

RE: Submission on Treasury Laws Amendment (Measures for Consultation) Bill 2023: Financial Adviser Professional Standards **Exposure Draft**

1. Introduction

Grain Trade Australia (GTA) welcomes an opportunity to provide feedback on the Government's Exposure Draft Treasury Laws Amendment (Measures for Future Bills) Bill 2023: Recognising experience in the financial advice industry.

This submission is in addition to previous GTA submissions to Treasury plus correspondence written to Treasury portfolio Ministers and ASIC to raise concerns with the financial advisor's education requirement and the AFSL regulations and guidelines. Feedback has included:

22 nd September 2022	The Quality of Advice Review Proposals F	aper <u>(Link: here)</u>
21st September 2022	The Financial Adviser education standard	ls consultation paper
	2022 (<u>Link: here</u>)	
2 nd June 2022	The Quality of Advice Review Issues Pape	r <u>(Link: here)</u>
4 th February 2022	The draft Terms of Reference for the Gov Quality of Financial Advice to consider h framework could better enable the provi accessible and affordable financial advic (Link: here) and	ow the regulatory sion of high quality,
1 st February 2022	The Government's Policy Paper "Education Financial Advisors" published in December 1987.	

This Submission is in line to this prior correspondence.

Previous submissions and correspondence have in principle been supportive to a regulatory approach that is:

- relevant to the context,
- has simplicity in its design,
- understanding and subsequent application.

This is because this form of approach will minimise the cost burden on business and may avoid cost increases to consumers and minimise distortion in business efficiency and serve the desired outcomes.

A key GTA design principle is to not provide a 'one size fits all' approach to Financial Adviser Professional Standards as the sector and its services to clients has proven to be too diverse for this form of industry education standard.

GTA remains concerned with the overall regulatory Financial Services regime, as to its application and impact on the grain industry and GTA members. We have again taken the opportunity of raising some of these issues in this submission.

2. About GTA

Grain Trade Australia (GTA) is a national member association and is the focal point for the commercial grain industry within Australia.

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. A full list of GTA Members can be found here and in the addendum attached to this submission.

GTA's core focus is to "facilitate trade" in the Australian grain industry. It's products and services, including the Australia Grain Industry Code of Practice, provides a self-regulatory framework across the grain industry to facilitate and promote the trade of grain within the Australian grain value chain.

A key segment within this industry framework is GTA members who provide commodity marketing & price risk management services (advisory services) to Australian grain producers and consumers.

3. The role of Commodity Marketing & Advisory Services

GTA members who provide advisory services provide grain producers and consumers with the information and advice needed to make informed decisions on their commodity marketing and commodity price risk management. This includes:

- 1. Commodity (grain) market analysis and price discovery,
- 2. Brokerage of physical grain,
- 3. Use of price risk management tools (derivatives like Swaps, Futures, Options),
- 4. Hedging foreign exchange (either a part of a derivative or for cash flow purposes), and
- 5. Grain sale and contract optimisation.

A grain marketing advisor with an AFSL provides advice specifically to help a grain producer or consumer manage their price risk in relation to the particular commodity using specific financial products. The advisor in this case is not providing holistic plans in relation to a client's broader investment needs (superannuation, insurance etc) but scoped, focussed advice related to commodity price risk – which is usually a specific condition under their AFSL.

So, for a grain grower or consumer this is **not an investment decision but more a transactional decision to manage grain price risk.** This means the role, expertise and skill sets of a commodity marketing advisor is very distinctive from a financial planner and therefore from the "one size fits all" approach that has been adopted by FASEA. The FASEA model assumed all financial service providers require the skillsets, experience, and qualifications of a financial planner.

4. GTA comments on the Treasury Laws Amendment

In terms of the reform outlined in the *Treasury Laws Amendment (Measures for Consultation) Bill* 2023: Financial Advisor Professional Standards Exposure Draft, GTA offers the following comments:

• GTA confirms its support to remove tertiary education requirements for financial advisers who have passed the exam, have 10 years' experience and a clean record of financial advice practice. Although, we note our previous submissions with regards to the exam, in terms of its lack of relevance to some sectors (including grains) and that the exam should be more tailored to broader contexts and segments.

- However, given the nature of advice provided by grain marketing advisers we believe that
 other relevant experience, such as trading or risk management in relevant (eg grain)
 markets should be also considered as relevant experience, rather than only financial
 advising experience.
 - It is this broader type of experience that can help advisors develop a deeper understanding of the relevant markets and risks, and therefore provide better quality advice to their clients.
 - Such experience would be more relevant in a grain context than an advisor who had
 previous experience in say insurance or equities. GTA has previously suggested a
 practical solution to this would be to allow licensee's and / or potentially industry
 associations to determine what experience they consider relevant to their business
 and clients.
- We remain concerned with the proposed cut-off date for the experienced pathway on 31 December 2021. Whilst an improvement on the proposed 1 January 2019 we still believe this should be extended to 30th June 2022 (at least) or to date closer to the implementation of the reforms, as it would in effect mean a current experienced advisor would require at least 13 years' experience (ie not 10 years), and noting that from a grains perspective, the volatility in the grain markets from Covid-19 and Russian invasion of Ukraine has been unprecedented, and provide significant experience to grain industry advisors during these times.
 - Further, we do not support an expiry date for which experienced advisors, that do not fully comply with the stated 'experienced provider' requirements are required to undertake tertiary study, as this makes the intended purpose and outcomes of the experienced pathway meaningless and redundant. There needs to be some discretion and allowance in particular cases including where a grain marketing adviser who may have 15 years of grain market experience and 6 years of providing marketing advice to grower clients. This may be something that can hopefully be dealt with through the 'as determined by the Minister' arrangement. Clarification on this would be appreciated.
- We believe the draft arrangements have not moved significantly from the failed FASEA 'one size fits all' approach. The proposed reforms still fail to adequately recognise the diversity of sectors and client risks within 'financial services and assumes or in fact dictates that anyone providing **any sort of financial advice**, must be trained as a financial planner, despite the relevance to the client's situation and the end objective of providing good quality advice to the client
- Currently the scope of approved tertiary degrees remains too narrow and, in many instances, **irrelevant to providing grain price risk and marketing/financial advice**. In our view the core knowledge areas should be contextualised for the relevant sector (eg financial planning, insurance, stock broking, agricultural price risk management) and include a broader range of knowledge areas such as commodity derivatives, foreign exchange and degrees such as commerce, economics, agri-business, agricultural science, agricultural economics and agricultural marketing.
 - GTA notes there is now a pathway in the Treasury Laws Amendment for **the**Minister to approve individual applications for equivalent domestic

 qualifications. This may prove to be of benefit to grain marketing advisers and
 other sectors. However, there is not enough detail provided in the Exposure Draft
 Explanatory Material to understand the value or the process for application.
- As previously raised the Exam is not fit for purpose. We would suggest that the Exam be made more relevant to an adviser's situation, and that there could be choices of different scenarios included in the exam.
- In considering a 'clean disciplinary record' we would suggest the focus should be on dishonest, misleading and deceptive unethical conduct rather than minor breaches of a technical or administrative nature. We recognise that multiple instances of minor breaches could be addressed with the adviser/licensee.
- We remained concerned with the proposed continuing professional development requirement for an advisor to complete 40 hours of CPD per year including a prescribed breakdown of

minimum hours to be spent in various areas. For example, the hours required on professionalism and ethics (seemingly every year) should be proportionate against other areas such as technical competence. We support CPD however believe there should be flexibility to customise to the specific needs, and circumstances of the industry / sector, the advisers and any AFSL restrictions.

We do not support mandating a professional year standard, as it presents another cost barrier
for business and/or new entrants (who will have already passed a recognised degree) into
industry. As noted earlier above, we suggest specialisation and training requirements should
be aligned with AFSL conditions and can be addressed through practical experience and
tailored contextualised professional development.

5. Regulatory Burden

We wish to reiterate the ongoing legislation and regulation since 2016 in relation to financial advice, in particular the Corporations Amendment (Professional Standards of Financial Advisors) Act 2017 are placing an increasing compliance burden and financial cost on our relevant members. The financial burden includes:

- costs related to the FASEA exam,
- the on-going cost of CPD,
- the ASIC industry funding levy,
- various ASIC lodgement fees, and
- uncertainty surrounding levies to fund the Compensation Scheme of Last Resort.

The increasing costs are either in part passed onto the consumer of these services (making the cost of obtaining advice for those more in need - more prohibitive) or being absorbed into the advisory business (usually a small business) leading to advisers increasingly questioning the sustainability of continuing to provide advice.

In our view, the regulatory burden on business, inclusive of maintaining an environment for businesses to compete, and the ultimate impact on consumers, needs to be a priority of reform. We believe Government should aspire for greater impact than what is contained in the Financial Adviser Professional Standards Exposure Draft.

6. Impact on Industry and GTA members

Getting the Standards balanced is critical for the grain industry being able to maintain experienced advisers and attract new entrants to ensure grain growers have access to highly specialised advisors.

Without further change than what is proposed to education standards there will be experienced advisers leave the industry that will be difficult to replace with new entrants.

The sector needs to attract new entrants, and these people are more likely to come from (and have interest in the industry) a background of degrees in commerce, economics, finance, agriculture, and business (in essence commodity and currency markets) and <u>not</u> financial planning.

It is also important to understand grain advisory firms are small rural businesses (1-7 advisors) and do not have the financial ability to fund sizable salaries while potential new and existing advisors' retrain.

7. Conclusion

GTA supports licensing of financial advisors and supports the ability of consumers (in this case grain producers and consumers) being able to access professional, ethical and high-quality advice.

We support change to the legislative instruments that were established by FASEA and promote educational relevance as a key tenet of the Education Standards for financial advisors.

However, this should <u>not be</u> a 'one size fits all' approach given GTA members that hold an AFSL usually have them for the limited scope of providing financial product advice (or dealing in a financial product) for the designated products <u>only</u> of derivatives and foreign exchange. The training requirements should be aligned to the Licence scope and the determination of an 'experienced provider' should be flexible and in the context of grain marketing advisors should consider the experience and time spent working within a grain market facing role as part of the experience

GTA is supportive of change that:

- a) Recognises financial advice is broader or more specific than financial planning.
- b) Defines educational requirements to meet the specific needs of sectors, are aligned with licence conditions, rather than assuming all financial advisors provide financial planning.
- c) Includes Tertiary (degree) level study for commerce, business, finance, economics, science, agribusiness, agricultural marketing, agricultural economics, agricultural science, rural science as formally recognised suitable "related fields of study" for the proposed Qualification pathway.
 - o Existing advisors' qualifications in these disciplines be grand fathered in.
- d) Supports relevant industry experience that supports the provision of grain marketing services is recognised as relevant in the Experience pathway.
- e) Provides the ability and flexibility to tailor CPD requirements to the specific needs and circumstances of industry sectors, AFSL conditions and the advisors themselves.

GTA would welcome the opportunity to engage directly with Government to increase the understanding of the type of financial advice our members provide and to provide input into, or be part of, any process that aims to make a more appropriate fit for purpose regulatory model.

Please do not hesitate to contact GTA on this or any other relevant matters.

Yours faithfully,

Pat O'Shannassy CEO, Grain Trade Australia



Membership List as of 18 April 2023

Organisation Contact Website /Phone **Ordinary Member (Trading)** Level A1 (over 7 Million Tonnes) CBH Grain Pty Ltd Mr Jason Craig cbh.com.au glencoreagriculture.com.au Viterra Australia Pty Ltd Mr Philip Hughes Graincorp Operations Ltd Mr Robert Spurway graincorp.com.au Level A2 (5 - 7 Million Tonnes) Level A3 (3 - 5 Million Tonnes) Cargill Australia Limited Mr Zsolt Kocza cargill.com.au Level A4 (1.5 - 3 Million Tonnes) Mr Darryl Borlase ADM Trading Australia Ptv Ltd adm.com Level B1 (1.0 - 1.5 Million Tonnes) Emerald Grain Pty Limited Mr David Johnson emeraldgrain.com Manildra Group Mr Peter Sloan manildra.com.au Arrow Commodities Pty Ltd Mr Dominic Vanzella arrowcom com au Bunge Agribusiness Australia Pty Ltd Mr Stephen Bennett bunge.com/agribusiness CHS Broadbent Ptv Ltd Mr Steve Broadbent broadbentgrain.com.au Riordan Grain Services Mr Mark Lewis riordangrains.com.au Level B2 (500,000 - 1 Million Tonnes) Mr Brett Dodson Australian Grain Export Pty Ltd australiangrainexport.com.au Centre State Exports Ptv Ltd Mr Jeff Voigt centrestateexports.com.au Cofco International Ms Sara Pan cofcoagri.com.au gwf.com.au George Weston Foods Limited Mr Mark O'Brien Inghams Enterprises Pty Ltd Mr Matt Clarke inghams.com.au Ridley Agriproducts Pty Ltd Mr Michael Reeves agriproducts.com.au Riverina (Australia) Ptv Ltd Mr Gareth Stapleton riverina.com.au ETG Commodities Ptv Ltd Mr Peter McMeekin peter.mcmeekin@etgworld.com Level B3 (250,000 - 500,000 Tonnes) Mr Brett Duczmal alliedpinnacle.com Allied Pinnacle Ptv Ltd Mr Gary Robinson Robinson Grain Trading Co Pty Ltd robinsongrain.com.au Wilmar Gavilon Ptv Ltd Mr Matt Albion 07 3713 8700 Louis Dreyfus Company Australia Pty Ltd Mr Oliver Reid louisdreyfus.com.au Quadra Commodities Ptv Ltd Mr Robin Cassar quadra.com Brahman Commodities Pty Ltd Mr Michael Aikman brahmancommodities.com.au Boolah Farms Pty Ltd Mr Stuart Tighe 02 6754 0343 Fletcher International Exports Pty Ltd Mr Kurt Wilkinson fletchint.com.au K M & W M Kelly & Sons Mr Matt Kelly kellygrains.com.au **Demeter Grains** Mr David Oates/Barry Mansfield 08 9410 5818 Level C1 (over 10 employees, under 250,000 Tonnes) Mr Ian Mack Adams Australia Ptv Ltd adamsaustralia.com.au Agracom Pty Ltd Mr Joe Hallman agracom.com.au 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 Bhuyan Gandhi 07 4662 1999 Australian Food and Fibre Mr Peter Webb australianfoodandfibre.com.au Australian Fresh Milk Holdings (AFMH) Ms Jill Smith 02 6344 8462 BFB Ptv Ltd Mr Shane Bird bfb.com.au Blairs Produce Company Mr Sean Blair 02 6025 4600 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 Deckert Group Pty Ltd Mr Chris Deckert deckerts.com.au Mr Rajeev Saraff ddtholdings.com.au DDT Holdings Pty Ltd **Esperance Quality Grains** Mr Neil Wandel members.westnet.com.au/eqg Hanlon Enterprises Grain Mr Chris Coates hanlonenterprises.com.au Hazeldenes Chicken Farm Pty Ltd Mr Marcus Dingle hazeldenes.com.au HX Food Group (Aus) Pty Ltd Mr Dong Zhao hxfoodgroup.com.au Independent Grain Handlers Pty Ltd

igh.net.au

irwinstockfeeds.com.au

Mr Brad Bryant

Mr Bryan Irwin

Irwin Stockfeeds

Itochu Australia Ltd Mr Ayush Rajvanshi itochu.com.au Inari Australia Pty Ltd Mr Karan Singh inariaustralia.com.au J K International Pty Ltd Mr Sandeep Mohan iki.com.au Rex James Stockfeed Pty Ltd Ms Natasha Davies/Samuel James jamesstockfeed.com.au Jerilderie Grain Storage & Handling Mr David Barlow 03 5886 0344 Laucke Flour Mills P/L Mr Roger Laubsch laucke.com.au Lawson Grains Ptv Ltd Mr Angus Blair lawsongrains.com LDC Enterprises Australia Pty Ltd Mr Richard Porter 07 3253 5999 Mr David Simpson LINX Cargo Care linxcc.com.au LPC Trading Pty Ltd Mr Simon Langfield 02 6383 7222 Malteurop Australia Pty Ltd Mr Trevor Perryman 03 5277 1950 Mandala Trading Pty Ltd Mr Jayjeev Saraff mandalatrading.com.au 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 Premium Grain Handlers P/L Mr John Orr pgh.com.au Quattro Ports Mr Dave Allen quattroports.com.au Reid Stockfeeds Ptv Ltd Mr Nick Reid reidstockfeeds.com.au Rivalea (Australia) Pty Ltd - Animal Nutrition Mr Andrew Philpotts rivalea.com.au SunPork Farms Feed Mills Mr Mark Young 08 8532 4434 ThriveAgri Mr Charlie Brown thriveagri.com TSS Grain (Tasmanian Stockfeed Services) Mr Trevor Macleod tasstockfeed.com.au Unigrain Ptv 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

viridisag.com

Level C2 (under 10 employees, under 250,000 Tonnes)

Viridis Ag

Mr Brad Waterfield A T Waterfield & Son Ptv Ltd 03 5382 3725 A W Vater and Co Mr Kim Vater vater.com.au Advantage Grain Pty Ltd Mr Chris Nikolaou advantagegrain.com.au Access Grain Pty Ltd Mr Wade Humphreys accessgrain.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 François Darcas 03 9830 7021 Agromin Australia Pty Limited Mr Rajni Patel agromin.com.au

Mr Anthony Howard

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 Mr Damien White

Australian Mungbean Company Pty Ltd australianmungbean.com.au Avoca Grain Storage Pty Ltd Ms Julie Bartlett 03 5465 3633 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 Charles Coventry brounandco.com.au C & S Trading Pty Ltd Mr Craig Scholz scholzbh.com.au C K Tremlett Pty Ltd Mr Andrew Tremlett 08 8524 9050 Carpendale Agri Pty Ltd Mr Andrew Kluck 0448 761 246 Carson Stockfeeds Ptv Ltd Mr John Carson 0429 601 201

Chester Commodities Pty Ltd Mr Richard Black chestercommodities.com.au CL Commodities Ptv Ltd Mr Robert Lean clcommodities.com.au

Coorow Seeds Mr Brian Pover coorowseeds.com.au Cory Johnston (Aust) Pty Ltd Mr Justin Fav corvjohnston.com.au Craig Tyack Grain Trading Mr Craig Tyack 0428 729 167 Mr Mark Schmidt Deacon Seeds Company 07 4662 3217

Defiance Maize Products Pty Ltd Mr Rodney Walker corson.co.nz Mr Mark Davis Direct Grain Ptv Ltd directgrain.com.au/ Direct Commodities Pty Ltd Mr Hamish Robertson directcommodities.com.au East Coast Stockfeed Ptv Ltd Mr Stuart Dolden ecsf.com.au Ellerslie Free Range Farms Pty Ltd Mr Bruce Holden 07 4695 5777 ETG Processing Pty Ltd T/A Wimpak Mr James French wimpak.com.au exportimportaustralia.com.au Export Import Australia Ptv Ltd Mr Dhanesh Kumar

Export Trading Group Australia Pty Ltd Mr Shayne Clark etgworld.com Fanmac Logisitics Pty Ltd Mr Chris Fanning fanmaclogistics.com.au Feed Central Pty Ltd Mr Tim Ford feedcentral.com.au Findlays Barellan Mr Neil Findlay 02 6963 9246 Forest Enterprises Development & Consulting Pty Ltd Mr Charles Lowe 02 6662 8261

Grenfell Commodities Ptv Ltd Mr Glenn Beasley grenfell.com.au GO Resources Pty Ltd Ms Rosemary Richards go-resources.com.au

Godde's Grain & Fertiliser Pty Ltd Ms Bec Leitch 02 6029 8332 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 Ptv Ltd Mr Derek Larnach 02 6331 4880 GrainTrend Ptv Ltd Mr Sanjiv Dubey graintrend.com GV Grain & Fodder Ms Joanne Harry 03 5828 3063 Hartree Partners (Australia) Pty Ltd Mr Daniel Miller hartreepartners.com Harwood Grains Ptv Ltd Mr Paul Harwood harwoodgrains.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 kennettrural.com.au Lachlan Commodities Pty Ltd Mr Tony Cogswell 02 6851 2077 Lake Grain Pty Ltd Mr Derek Davis lakegrain.com.au Lane Grain Ptv Ltd Mr Garry Lane 02 6887 3309 Laragon Almond Processors Pty Ltd Mr Mark Webber laragon.com.au marinacommodities com Marina Commodities Mr Palwinder Singh Mr Lachlan McKenzie McKenzie Ag Services mckenzieag.com.au McNaughts Grains & Fertilizer Pty Ltd Mr Daniel McNaught 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 Nandaly Grain Co-Operative Ltd Mr John Bucknall 03 5078 1217 Network Grains Pty Ltd Mr Craig Dennis 07 4637 8500 Origin Grain Ptv Ltd Mr Peter Brick 03 5720 8500 Outlook Commodities Pty Ltd Mr Dominic Hogan 0419 351 845 Pacific Global Sprouts Pty Ltd Mr Prashant Kewlani pacificglobalsprouts.com Parkinson Bros Mr Rohan Parkinson parkinsonbros.com.au PB Seeds Ptv Ltd Mr Peter Blair pbseeds.com.au Pearson's Grain Ptv Ltd Mr Darren Pearson pearsonsgroup.com.au Peters Commodities Pty Ltd Mr Michael Oxlev petcom.com.au Pinnacle Grains Pty Ltd Mr Sonal Vij 0451 002 482 Plum Grove Pty Ltd Ms Rikki Foss plumgrove.com.au Pure Foods Eggs Pty Ltd Ms Charmain Cain purefoods.com.au QS Commodities Pty Ltd Mr Nick Slipper 0439 173 907 Quirindi Grain & Produce Mr John Webster 02 6746 1911 RP Grain Ptv Ltd Mr Gordon Pulham rpgrain.com.au Rural Logic (Aust) Ptv 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 Leslev 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 Spagricon Australia Pty Limited Mr Jiger Kotecha spagricon.com.au Standard Commodities Australia Pty Ltd Ms Elizabeth Bozinoska stancom.com.au Sudima Australia Ptv Ltd Mr Jim Garvey sudima.com Southern Grain Pty Ltd Mr Tim Gross 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 Targray Australia Pty Ltd Mr Srinivas Boyapalli targray.com tillercommodities.com Tiller Commodities Ptv Ltd Mr Brett Cooper TRC International Pty Ltd Mr Yohan Goonetilleke 0412 921 812 ulusoyflour.com Ulusov Asia Pacific Mr Mark Madjarevic commoditymanagement.com.au Universal Commodity Management Mr Tim Dean Ward McKenzie Pty Ltd Mr Geoff Hammon mckenziesfoods.com.au Watson's Bulk Logistics Mr Joel Watson wbl.net.au WHG Oceania Pty Ltd Mr Gesheng Shen 02 8040 3030 Wirrinourt Transport & Trading Mr Karl Hendy wirrinourttransport.com.au WW Agri Pty Ltd Mr Steve Sloss wwagri.com.au ZTC Australia Mr Tim Byass ztcaus.com **Transport Operator**

Crawfords Freightlines Pty Lts Gehrke Grains and Transport Pty Ltd Hamilton Contracting (NSW) Pty Ltd Horne Ag Logistics Pty Ltd Pacific National (NSW) Pty Ltd

Mr Julian Gehrke Mr Jeremy Horne Mr Nick Ryder Mr Bikash Ram SEAWAY Intermodal Pty Ltd

Mr Phillip Davis crawfordsfreightlines.com.au 07 5465 6695 Ms Jodie Hamilton hamiltoncontracting.com.au horneaglogistics.com.au pacificnational.com.au seawayintermodal.com.au

Broker Large

0

Medium

Fox Commodites 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 Rain Argibusiness Mr Ian Grellman rainag.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 Pure Grain Network Ptv ltd Mr Stuart Tighe puregrain.com.au Ms Jayne Barker Quest Commodities Pty Ltd questcommodities.com.au Teague Australia Pty Ltd Mr Tim Teague teague.com.au

Sole Operator

A C Grain Mr Adam Clarke 0400 065 763 Allied Grain Ptv Ltd Mr Angus Wettenhall alliedgrain.com.au Cogeser (Australia) Pty Ltd Mr Robert Luetolf cogeser.com.au Farm Tender Mr Matt Henke farmtender.com.au Lotema Pty Ltd Mr Todd Lees lotema.com.au Mallon Commodity Brokering Mr Ian Mallon

Woodside Commodities Pty Ltd Mr Hamish Steele-Park woodcomm.com.au

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 Barrett Burston Malting Co Pty Ltd Mr Dean Ganino bbmalt.com.au Boortmalt Asia Pacific Ptv Ltd Mr Simon Robertson boortmalt.com Commonwealth Bank of Australia Mr Samuel Chambers commbank.com.au National Australia Bank Ltd Mr Christian Bowes nab.com.au NSW Ports Mr Campbell Mason nswports.com.au

Medium

agridigital.io AgriDigital Mr Henry McKay Agrifood Technology Pty Ltd Mr Rob Anderson 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 Mr James Saunderson commodityinspection.com.au Foss Pacific Ptv Ltd Mr Phil Soderberg foss.com.au Holding Redlich Mr Geoff Farnsworth holdingredlich.com HFW Australia Mr Stephen Thompson hfw.com Intertek Mr Ben Jones intertek.com Mars Petcare t/a Mars Birdcare Mr Kurt Sosinki 07 3719 0100 Oldendorff Carriers Mr Ben Harper oldendorff.com SBA Law Mr Jeremy Rosenthal sbalaw.com SGS Australia Pty Ltd Mr Scot Paterson au.sgs.com T-Ports Ptv Ltd Mr Kieran Carvill tports.com Qube Logistics (SB) Pty Ltd (T/A Qube Agri) qube.com.au/logistics/agri/ Mr Jeremy Brown

Small

Advance Trading Australasia Mr Andrew Woodhouse advance-trading.com.au Ag Scientia Pty Ltd Mr Lloyd George 03 9598 1980 Mr Shane Sander Agvise (WA) Pty Ltd agvise.com.au Mr Alex Campbell Aperture Ag Pty Ltd 0450 201 103 Basis Commodities Pty Ltd Mr Chris Whitwell basiscommodities.com BSM Global Pty Ltd Mr Robert Fleming buysellmove.com Clear Grain Exchange Mr Nathan Cattle cleargrain.com.au 08 8388 8084 CloudBreak Grain Marketing Pty Ltd Mr Ed Scamps Mr Michael Parry 02 6772 0000 Delta Agribusiness Ptv Ltd EP Integrated Commodities Pty Ltd Ms Tracey Lehmann 08 8627 2304 farmanco.com.au Farmanco Marketing Pty Ltd Mr Donald McTaggart FarMarCo Australia Pty Ltd Mr Robert Imray 07 4637 6400 Finesse Solutions Pty Limited Mr Malcolm Finlayson 02 9872 9270 Flexi Grain flexigrain.com.au Mr Jarrod Tonkin Futari Holding Pty Ltd Ms Leah Petrie futari.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 Guud Asset Cerium Pty Ltd Mr Eric Chen

HarvestCheck Pty LtdMr Stephen Schumacher0418 199535Hay Plains Grain Storage Pty LtdMr Ron Harris0404 444 600

IKON Commodities Pty Ltd Mr Ole Houe ikoncommodities.com.au Mr Rob Martin Indvn Ptv Ltd indyn.net Lachstock Consulting Pty Ltd Mr Nick Carracher lachstockconsulting.com.au Longbridge Commodities Pty Ltd Ms Kareen Durr longbridge.com MarketAg Pty Ltd Mr Mark Martin 02 6747 1590 McMullen Consulting Pty Ltd Mr Gerard McMullen 03 8300 0108 Mercari Pty Ltd Mr Daniel Marsh 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 praig.com.au Primal Foods Group Mr Peter Longhurst primalfoodsgroup.com Profarmer Australia Pty Ltd Mr James Maxwell australiancropforecasters.com.au Rise Agribusiness Pty Ltd Mr Ian Dalgliesh riseagri.com.au Pinion Advisory Mr Chris Heinjus ruraldirections.com Saputo Dairy Australia Pty Ltd Mr Ashley Denishensky 1800 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 ttclub.com Ultimate Global Trading Pth Ltd Mr Andrew Alexopoulos ultimategt.com.au Wattletree Consulting Pty Ltd Mr Jon Bucknall

International Affiliate

CIS - Commodity Inspection Services Mr Paul Schweitzer cis-inspections.com

Industry Association

Australia Export Grain Innovation Centre Mr Richard Simonaitis aegic.org.au graingrowers.com.au Grain Growers Limited D. McKeon Grain Industry Association of WA Mr Peter Nash giwa.org.au Grain Producers Australia Ltd Mr Colin Bettles grainproducers.com.au NSW Farmers Association 02 9478 1000 Mr Peter Arkle

Merchant Association

Grain Industry Association of SA Ms Marie Cunningham +61 8 8361 5601 Grain Industry Association Of Victoria Mr Colin Peace giav.com.au Grain NSW Inc grainnsw.com.au Ms Joanne Ware Mr John Francis qam.org.au

Queensland Agricultural Merchants Inc.

Life Members

Mr Mervyn May Mr Christopher Kelly Mr Geoff Honey Mr Terry Deacon

Awarded 1998 Awarded July 2015 Awarded July 2016 Awarded August 2019