

22 November 2018

Mr Pat O'Shannassy
Grain Trade Australia
PO Box R1829
Royal Exchange, Sydney NSW 1225
Via email: pat.oshannassy@graintrade.org.au

cc: submissions@graintrade.org.au

Dear Pat,

RE: GTA Standards

GrainGrowers is a grain farmer representative organisation with more than 17,000 members across Australia. GrainGrowers' goal is a more efficient, sustainable and profitable grain production sector that benefits all Australia grain farmers and the wider grains industry.

On behalf of our members, GrainGrowers would like to raise the following matters to the Standards Committee.

1. Manual Vacuum Sampling

GrainGrowers has previously raised heightened concerns regarding grain sampling discrepancies across the 2016/17 and 2017/18 seasons. In particular, there is reported to be significant discrepancy in pulse samples collected by (primarily manual) vacuum sampling probes. The discrepancies in samples produced by manual vacuum sampling probes are suspected to arise from:

- i. Inconsistent design of different sampling probes (design error)
- ii. Inconsistent use of sampling probes by different operators (human error)

GrainGrowers previous submission regarding manual vacuum sampling can be found here: <https://www.graingrowers.com.au/graingrowers-submission-regarding-the-gta-technical-guideline-document-on-sampling/>

The GTA Committee has previously pledged to review current sampling process. As part of this review, GGL recommends:

- i. GTA Standards Committee provide a thorough and comprehensive review of the current GTA Technical Guidelines Document (TGD) on Sampling. This review must aim to strengthen the TGD document and minimise sampling errors caused by (1) inconsistent design of different vacuum sampling probes; and (2) inconsistent use of sampling probes by different operators.
- ii. GTA provide a thorough quantitative review of various grain sampling methodologies (including equipment and technique) to ensure the sample produced is representative of the truckload.

- iii. GTA and Industry consider the merits of the National Measurement Institute extending regulatory oversight to the area of grain sampling (including method and equipment).
- iv. GTA consider recommending that industry, if using vacuum sampling probes, use only mechanical (not manual) probes.
- v. GTA consider mandatory reporting (and subsequent investigation into the cause) of instances whereby significant sampling errors have occurred.

2. Moisture – Tasmania (All Cereals)

GrainGrowers has previously urged the GTA Standards Committee to amend the moisture receival standard for cereals in Tasmania to 13.5% to allow for the higher ambient moisture content in Tasmania. Cereals can be safely stored at 13.5% particularly in the cooler temperatures experienced in Tasmania.

In the past wheat was received in Tasmania at up to 13-14% moisture. However in recent years there has been a move by receivers in Tasmania to implement the GTA standards with no regard to the different conditions local growers face. Tasmanian growers operate in a maritime climate vs the Mediterranean climate observed in mainland Australia. For comparison, New Zealand, which has a similar latitude to Tasmania and also a maritime climate has a receival limit for moisture at 14.0%, the UK limit is 14.5%.

GrainGrowers notes that GTA CEO addressed small segment of Tasmanian industry in Q2 2018, however feedback to GrainGrowers is that growers/harvesting contractors continue to want standards reviewed and changed. As such, GrainGrowers continues to urge the GTA Standards Committee to amend the moisture receival standard for cereals in Tasmania to 13.5%.

3. Nil Contaminants

GrainGrowers recommends that the nil tolerances applied to various quality parameters should be replaced with an appropriate low level presence tolerance, except only in those instances where regulatory requirements for nil tolerance exist.

GrainGrowers commends the Committee on its undertaking to “review of the applicability of the nil tolerance applied to various quality parameters”. However we note that this has been an undertaking that has arisen in past GTA Standards Committee reports (including at least 2016 and 2017) with little progress achieved. As such, GrainGrowers urges the Committee to undertake this review as a matter of priority with the objective of implementing appropriate low level presence tolerances for the 2019/20 season.

4. Changes to ANW2 standards

GrainGrowers supported the GTA Committee recommendations (dated 13th June 2018), that stated:

- i. The Committee agreed not to seek approval from the GTA Board to fast track any changes to the ANW2 Standards for 2018/2019.
- ii. The Committee agree to recommend the following Agreed Changes to the ANW2 Standards in 2019/2020:
 - a. decrease Unmillable Material (above the screen) from 1.2% to 0.6%;
 - b. decrease Small Foreign Seeds from 1.2% to 0.6%
 - c. The Committee agreed to a proposed change to the ANW2 Standards for screenings be considered for 2019/2020 season. The screening Standard based on the outcome of the review of dockage data should be set within an expected range between 5% to 10%.

Table 1: Potential Changes to ANW2 Standards 2019/20

Quality Parameter	2017/18	2018/19	2019/20
Screenings (% by wt)	10.0	10.0	5.0-10.0
Unmillable material above the screen (% by wt)	1.2	1.2	0.6
Small Foreign Seeds (% by wt)	1.2	1.2	0.6

GrainGrowers support of the above position was, and remains, conditional upon adequate consultation with industry, and adequate information being provided to the committee regarding the need for change, and how the proposed changes would meet the stated objectives.

5. Pulse Australia – Defective Tolerances in Faba Beans

In a submission to the Pulse Australia standards committee, dated 10th May 2018, GrainGrowers noted that the current defective tolerances applied to No.1 Domestic faba beans unfairly penalise Australian farmers.

The current difference in “non-colour” defects (“all other defects”) tolerance between No.1 Domestic standard the No.1 Export standard is up to 7% wide. This difference in tolerance between the domestic standard and the export is unnecessarily and unreasonably large, and over-reaches any possible damage that should occur to faba beans during the course of normal storage and handling processes.

GrainGrowers proposes that this issue can be resolved very simply, resulting in an acceptable outcome for the Australian faba bean industry, covering growers, domestic marketers, storage and handling companies, exporters and consumers.

GrainGrowers recommends that the Committee adjust the Defective tolerances applied to No.1 Domestic to be more consistent with the other faba bean standards published by Pulse Australia. In particular, we recommend that the No.1 Domestic standard be simplified and include only (1) Defective (colour only); and (2) Total Defective (includes colour).

Table 2: Current Standards (2017/18)

	Faba No.1 Domestic	Faba No.2 Domestic	Faba No.1 Export (bulk)	Comments
Defective (colour)	3%	7%	3%	No difference in No.1 Domestic and No.1 Export Standard
Defective (all other defects)	3%	Not specified (thus up to 10%)	Not specified (thus up to 10%)	Up to 7% difference...
Defective (total, includes colour)	6%	10%	10%	4% difference

Table 3: Proposed Standards (2018/19)

	Faba No. 1 Domestic	Faba No.2 Domestic	Faba No. 1 Export (bulk)	Comments
Defective (colour)	3%	7%	3%	No difference in No.1 Domestic and No.1 Export Standard
Defective (all other defects)	Not specified (thus up to 6%)	Not specified (thus up to 10%)	Not specified (thus up to 10%)	n/a
Defective (total, includes colour)	6%	10%	10%	4% difference

Our existing submission to Pulse Australia is available here <https://www.graingrowers.com.au/submission-to-pulse-australia-standard-review-defective-tolerances-in-faba-beans/>

Yours sincerely,



Luke Mathews

GrainGrowers Trade and Economics Manager