



SUBMISSION TO

Wheat Port Code review

A response to the DAWR
Interim report of the review of the Competition and
Consumer (Industry Code—Port Terminal Access [Bulk
Wheat]) Regulation 2014

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ABOUT GRAIN PRODUCERS AUSTRALIA

Grain Producers Australia (GPA) represents Australia's broadacre, grain, pulse and oilseed producers at the national level.

Grain Producers Australia works to foster a strong, innovative, profitable, globally competitive and environmentally sustainable Australian grains industry. Representing 5200 farm businesses, it strives to represent Australian grain farmers nationally and internationally in their contribution to sustainable development and society.

Working with its members – state farm organisations and farmers across the grain production area of Australia - GPA advocates for sound outcomes that deliver a positive commercial result. GPA is a not-for-profit company limited by guarantee. It is governed by a board, elected by its members.

The objectives of GPA are to:

- Provide a strong, independent, national advocate for grain producers based on a rigorous and transparent policy development process.
- Engage all sectors of the Australian grains industry to ensure operation of the most efficient and profitable grain supply chain.
- Facilitate a strategic approach to research, development and extension intended to deliver sound commercial outcomes from industry research.

GPA has a policy council, strategically focused on three pillars of economic development, social responsibility and environmental management. Our policy council is supported by, and engages with, representatives from State Farm Organisations including:

- Agforce Grains
- Grain Producers SA
- NSW Farmers Association
- Victorian Farmers' Federation Grains Group
- Tasmanian Farmers and Graziers Association
- WA Farmers
- WA Grains Group

GPA manages the biosecurity program for the grains industry through Plant Health Australia and is a joint Representative Organisation ("RO") responsible for overseeing the performance of the Grains Research and Development Corporation (GRDC).

Further information:

<https://www.grainproducers.com.au/>

RECOMMENDATIONS

Grain Producers Australia acknowledges the review process being undertaken by the Department of Agriculture and Water Resources (DAWR) to review the Wheat Port Code. Grain Producers Australia reiterates the points made in our initial submission (January 2018), many of which we have been providing consistent feedback on since the early commencement of The Code.

In response to DAWR's Interim Report, while grain producers strongly support stewardship and self-regulation, we acknowledge that the grain industry continues in a transition phase and as such, The Code will need to remain in place for some time. We support the continuation and improvement of the Wheat Port Code.

Short term action

In the short term, GPA believes The Code would benefit from several improvements which include:

- Reporting of stocks information, by port zone and grade.
- Reporting of 'up country' grain to provide for greater supply chain transparency.
- Specified timing for the provision of shipping stem information/reporting, to ensure consistency and transparency. In addition, GPA would like to see shipping stem information on all major grades of grain published.
- The introduction of penalties, to provide greater incentive for improvement by operators.
- A review of the current exemptions.

Further investigation required

Grain Producers Australia welcomes the Australian Competition and Consumer Commission's (ACCC's) interest and input on this issue and is pleased that the organisation has acknowledged many of the issues that growers have identified, and called for action on, since the early implementation of The Code, including a potential expansion to incorporate other grains and the inclusion of 'up country' facilities. That said, we do not believe that The Code is the appropriate mechanism by which to deal with the issues identified. As a result, Grain Producers Australia is calling for a full and robust review of the grain operating environment to identify competition and consumer protection issues and to explore appropriate mechanisms for solutions - both regulatory and non-regulatory.

We call on the Government to acknowledge these issues and recognise this need and to act in a prompt and timely manner, to initiate a review, similar to that undertaken in other commodity sectors such as dairy, to explore these issues and ensure informed regulatory and policy decisions to support the industry's long-term future.