

# Member Update

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**TOPIC:** *2nd Industry Call for Submissions on 2022/23 GTA Standards*

**DISTRIBUTION:** GTA Members – primary contact list. Please circulate to all appropriate internal parties.

## 1. Issue

In March 2022, Grain Trade Australia (GTA) released an industry submission paper calling for industry input into the development of Grain Trading Standards (Standards) for the 2022/23 season. Feedback was received by GTA from industry on the issues outlined in that paper.

The GTA Trading Standards Committee (Committee) has recently met to discuss industry feedback and to develop potential Standards for 2022/23.

This document is provided for industry consideration. It lists the following information on the 2022/23 Standards:

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## 2. Process for Industry Feedback

The Committee is seeking industry comment on the issues outlined in this document and on any other Standards related issue.

Submissions should be received by COB Friday 20<sup>th</sup> May 2022.

Please lodge your submissions by sending to [submissions@graintrade.org.au](mailto:submissions@graintrade.org.au) and title your email – Standards Review 2022/23.

Industry is encouraged to provide supporting evidence for any change proposed in Standards. Preference is for industry to use the proforma for lodging submissions located on the GTA website at <http://www.graintrade.org.au/committees>.

Unless marked "confidential" and appropriate supporting reasons are provided, all submissions will be placed on the GTA website for industry review.

### **3. Agreed Changes for Adoption in 2022/23**

#### **3.1 Agreed Change: Visual Recognition Standards Guide – All Commodities**

While a revised version was published for the 2021/22 season, the Committee has agreed further changes are required for some commodities. A revised version for 2022/23 is intended to be published incorporating revised photographs and wording for various defective grain quality parameters. These changes are to provide greater clarity and aid industry interpretation.

A draft of the revised version will shortly be made available on request for review by industry.

#### **3.2 Agreed Change: Minor Wording Changes & Other Issues – All Cereal Commodities**

Minor changes to wording in all relevant Standards charts and Standards booklets will occur. These changes will refer to the latest versions of reference material available to assist industry implementation of Standards, including:

- Visual Recognition Standards Guide for 2022/23.
- The document entitled "Australian Grains Industry Post Harvest Chemical Usage Recommendations and Outturn Tolerances 2022/23" (see <https://www.graintrade.org.au/sites/default/files/NWPGP/Outturn%20Tolerances%20202122%2031Aug21e.pdf>).

#### **3.3 Agreed Change: Varietal Master List – Wheat, Barley, Oats**

As in previous seasons, the Varietal Master List for the above commodities will be reviewed following receipt of the changes from the industry sectors responsible for maintenance of those lists. All Standards will be revised based on those changes and advised to industry when the 2022/23 season Standards are released.

#### **3.4 Agreed Change: Contaminants - Millrun**

A submission in 2021 requested a change in the tolerance to be applied for contaminants for Millrun products. The request was that the Standards that were applied in 2015/16 be re-introduced, being a nil tolerance for contaminants.

The request indicated that the prior change was unintentionally made and recommended that the Standard revert to a nil tolerance for contaminants as previously applied. The Committee has reviewed the request and agreed the change will occur for the 2022/23 season for Millrun.

The Standard will refer to the following for Millrun (with the change agreed to be made as struck out/in italics):

ORIGIN GRAIN: Wheat\*.

\* Note for other origins or sources of the millrun, insert the name of the dominant grain which is the primary grain source of the millrun offal.

DESCRIPTION: Consists of coarse wheat\* bran, fine wheat\* bran, wheat\* pollard, wheat\* flour, ~~unground screenings,~~ ~~straw, wheat\* chaff and seeds.~~

PHYSICAL PROPERTIES:

Colour - Light tan to brownish.

Texture - Grind shall be uniform and material free of any lumps.

Odour - Clean and free from mustiness, sourness or any other odour which suggests an off-quality condition.

## CHEMICAL PROPERTIES:

Moisture - Maximum 14%.

## NIL ACCEPTANCE:

- Toxic matter or chemicals prohibited by National or State Laws against inclusion in Stockfeed, gravel, stones or other injurious matter such as glass, metal or any substance harmful to animal health.
- Salmonella must be absent.
- Chemical residues are not to exceed the MRLs established by the APVMA for wheat\* bran.
- To be free of water damage, rodent and insect infestation.
- *To be free of any foreign materials such as unground screenings, straw, wheat\* chaff, seeds of any other commodity, weed seeds.*

### 3.5 Agreed Change: Ryegrass Ergot - Pulses

A submission was received in relation to pulses requesting the same tolerance for Farmer Dressed Receival product to be applied for Farmer Dressed Export product. The Committee noted the decision is relevant to the Pulse Australia Standards committee and agreed to await their decision, noting verbal advice was received by Pulse Australia that it was in agreement with the submission.

## 4. Proposed Changes for 2023/24 Season

Industry is advised that the Committee intends to make the following changes to Standards for application in the 2023/24 season. Industry is encouraged to note the proposed changes and comment where applicable.

### 4.1 Proposed Change: Gumnuts – All Cereal Commodities

Industry has been previously advised of a review of the practicality of a Nil Tolerance in Standards and the intention of the Committee to consider developing low level tolerances for some contaminants.

The Committee has received a submission from industry seeking a low-level tolerance for gumnuts, given:

- The impracticality of removing a low number of gumnuts from a load.
- The implications of rejection of a truckload of grain for the presence of one gumnut, which may be of any size.
- The ability of many processors to remove gumnuts from a load prior to processing.

The Committee considered the submission and noted:

- *Eucalyptus spp.* may contaminate a grain sample in a number of ways including Gumnuts, whether whole or broken, of any size, immature or mature, or Pieces of plant material such as twigs, leaves of varying lengths and sizes.
- The presence of *Eucalyptus spp.* contamination of a load may lead to tainting of that load, with an obvious smell of eucalyptus. Depending on the size and amount of the material, and the maturity of the gumnuts, the tainting level and smell will vary. Even small amounts in a truckload of grain may lead to quality impacts.
- Where gumnuts are present, they may be immature or mature. As the gumnuts mature, the tainting varies, with less tainting generally occurring with more mature gumnuts. However, this varies depending on a range of factors.
- Market reaction to the presence of this material has generally been quite strong due to its potentially serious effects on end products and its high visibility amongst sound grain, even if the gumnuts have been removed.
- There is no test for the level of taint generated from the presence of *Eucalyptus spp.* material.

The Committee considered the submission and the many prior discussions on this topic and agreed to the following for the 2023/24 season:

- For all cereal commodities and grades, removing the current nil tolerance level for gumnuts only.
- A low-level tolerance for gumnuts only, of 1 gumnut/2.5L be included, similar to that applying for Stones.

- The definition of a gumnut be “whole or pieces of any size and maturity level”.
- The current definition and nil tolerance of other *Eucalyptus spp.* plant material remains in all Standards.
- Other industry sectors be encouraged to adopt the proposed changes i.e., pulses, oilseeds.

#### **4.2 Proposed Change: New ASW Grade – Wheat**

A submission was received from industry seeking to create a new milling grade with a minimum 9% protein. The Committee discussed the submission at length and noted:

- No change would occur to the current ASW1 Grade, which has no minimum or maximum protein.
- The protein content of the Western Australian crop has been declining in recent seasons, with receival data showing a decline from 2008.
- The Committee questioned the decline in protein and the needs of the market. Generally, the human consumption milling market has no demand for ASW below 9% protein.
- The current ASW1 protein range of the delivered crop is broad, creating a very different quality profile depending on the protein content.
- It was agreed there needs to be discussion across industry to assist with understanding the market requirements.
- It could be expected that growers who deliver higher protein ASW1 in the range of 9% - 10% may be missing out on higher returns if that grain was segregated rather than being commingled with ASW grain with a protein lower than 9%.

After discussion the Committee agreed:

- An ASW grade with a minimum protein of 9% be introduced nationally, for adoption in the 2023/24 season if agreed to be implemented.
- The specifications of the new grade be as per ASW1, with the exception of a minimum protein content of 9%.
- To seek industry views on this proposal.
- An industry Working Group be formed to discuss the changes to the declining protein content of the WA crop and the impact of the agreed proposal on various sectors of industry.

### **5. Issues for Further Ongoing Consideration**

#### **5.1 Further Research: Vacuum Sampling of Road Trucks – All Commodities**

Industry was advised of a proposal raised in 2018 to review the current use of vacuum probes to obtain a representative sample for the purposes of applying Trading Standards. It was agreed this project should be managed as a whole of industry review. GTA through GTA’s Trading Standards Committee offered to facilitate the project on behalf of industry, as it relates to the application of Standards.

The project development phase has been completed and funding sourced. There has been a delay in conducting the project due to Covid-19 restricting access to trial sites. It is hoped the trial can commence in 2022.

#### **5.2 Further Research: Justification of Trading Standards – All Commodities**

A request was received from industry on why certain tolerances existed in Standards for some commodities. Over time, the justification for Standards may not be as transparent as originally intended for several reasons including staff turnover, decisions are historical and not altered for many years.

The Committee recognised the value in providing supporting information to industry. It was noted that the topic includes a wide range of quality parameters and would utilise significant resources if all topics were to be addressed. The Committee agreed to progress the matter based on priority and has developed a list of higher priority parameters to address initially.

### **5.3 Further Consideration: Non-Industry Classified Varieties – All Commodities**

In 2020 the Committee was requested to develop a GTA grade for a wheat variety that at that point in time did not require the usual classification for wheat varieties (by Wheat Quality Australia (WQA)). The request arose because the variety was bred for a specific purpose outside of the normal use of milling/feed wheats in Australia. After reviewing the Committee could not agree on development of a new grade as the procedures and charter of the GTA Standards Committee did not cover such a situation.

Since that time other grades and classes are being developed for future release to industry and WQA has announced it has created new wheat classes including Australian Innovative Wheat. The Committee continues to review its charter and develop appropriate procedure to cover the above events of new classes and varieties, for wheat and all other commodities. It is expected to be finalised and released during 2022.

### **5.4 Further Research: Nil Tolerance Parameters – All Cereal Commodities**

The Committee had previously advised industry of a review of various aspects related to this topic including:

- The definition of Nil.
- The applicability of a Nil tolerance to apply for each quality parameter in a bulk grain load.
- Regulatory impacts of any potential change away from Nil.
- Suitable tolerances by quality parameter and commodity to apply.
- The consistency of the definitions and tolerances across commodities.
- The method of assessment, including sample size.

For the outcome on gumnuts, see 4.1 above. The Committee is currently also considering other high priority nil tolerance contaminants and will advise industry in due course.

### **5.5 Further Research: Foreign Material – All Cereal Commodities**

Industry had previously been advised of research that had commenced on ensuring clarity and consistency across commodities of the definition and method of assessment of Foreign Material (FM).

Since initiating the review the Committee has identified the need to consider a range of issues when developing recommendations. These issues included:

- Increased time for sample assessment of the FM content.
- Whether there are other implications and should the FM test be made a "mandatory" versus "voluntary" test.
- Extensive industry consultation is needed to reach agreement on FM definitions & levels to apply by commodity.
- Extensive discussions with traders and buyers (domestic/export) to explain all changes and reasons is required.
- The impacts of the change need to be considered across all States of Australia, for all end-use across all cereals.
- Industry views on the desire of the Committee to include the change across all Committees given some commodity sectors may not desire such a change.
- Potential impacts of the change on all non-cereal commodities.

The Committee will continue to assess the issues and will provide its recommendations for action and industry comment during 2022 via development of a Fact Sheet.

## 5.6 Further Research: ANW2 – Wheat

Research has been conducted in recent seasons, and more particularly in 2021/22 into Dockage levels in premium Western Australian grades such as noodle wheat and APWN.

A Working Group has met on several occasions to discuss the relevant issues and to consider the findings. Based on the most recent data, the Committee has determined a Position Paper will be developed and provided to industry to:

- Outline the issue in relation to the quality of grain supplied to customers.
- Discuss the outcome of the trials.
- Outline various options to resolve the customer concerns for industry consideration.

Following publication of the Position Paper, the Committee agreed it would not be required to action other matters on this issue unless warranted/raised by industry.

## 6. Issues not approved for Future Consideration or Change

The following is a list of topics that have been considered by the Committee in relation to various aspects of the Trading Standards. The Committee noted these were advised to industry in the first call for submissions in March 2022. The Committee has considered these and concluded:

- The decision for no change has been supported by industry.
- The issues as outlined are a low priority and do not require further attention at this time unless warranted.
- Where noted, are not approved for a change in Standards.

### 6.1 Not Approved: Sand, Soil and Earth Method of Analysis – All Cereal Commodities

There had been a call for a review of the method of assessment of these quality parameters with a view to make the assessment more consistent and practical than currently applied. The most significant issue reviewed was the potential to change measuring these parameters on a weight basis as compared to the existing counting method required for most commodities.

As the existing method is utilised where required and does not present any significant difficulties in general, the Committee agreed no further action is required at present.

### 6.2 No Change: Defect Tolerances SFW1 – Wheat

In 2020, a submission was received requesting that several defective grain quality parameters in the SFW1 Standard be altered (loosened) given that many of these quality parameters currently have limits closely aligned to milling grades. The reasoning was that SFW1 is used as a stockfeed grade.

It was noted that some sectors of industry apply variations as per the tolerances as requested to be altered based on seasonal conditions.

The changes proposed included:

Quality Parameter	Existing SFW1 tolerance	Proposed change
Stained	15% by count	50% by count
Field Fungi	10 grains per half litre	40 grains per half litre

Quality Parameter	Existing SFW1 tolerance	Proposed change
Dry Green or Sappy	10% by count	Unlimited
Severely Damaged	1 grain per half litre	5 grains per half litre
Insect Damaged	2% by count	4% by count
Over-dried Damaged	Nil	Unlimited

Over the 2021/22 harvest, a significant tonnage of grain was received as SFW1 under the existing Standards. Those tolerances did not cause any significant issues for industry. The quality received under those Standards is currently being marketed and feedback indicates end-users are comfortable to receive grain under those specifications as per the quality received during the 2021/22 harvest.

Based on the premise that the existing Standards are suitable for use, the Committee has agreed that the proposed change is not warranted.

### **6.3 No Change: Moisture – Maize**

A submission was received in 2021 seeking a reduction in the maximum moisture tolerance for maize from 14% to 13%. Several reasons for the proposed change were advised, with the main reason being the risk of quality deterioration during storage over the period required to store maize prior to outturn/receipt by the end-user.

The Committee reviewed the request and sought further feedback from the maize industry. Following consideration of feedback, the Committee determined that:

- This issue may be best dealt with through storage management practices.
- There is a range of educational material and industry experts to advise on the appropriate management of maize in storage under conditions where high moisture may be present.
- A reduction in the moisture limit would be detrimental to the grower's ability to harvest maize and deliver to their contractual specifications.

Based on the industry feedback no change will occur to the maize Standard for moisture.