Grain Producers SA (GPSA) is the Peak Industry Body for the South Australian grain Producers. It is unique in that it is a non-political body that represents all grain producers to government, the community and industry including, grain marketers, exporters, transporters, storage and handlers, researchers and farm input suppliers. It is funded via the SA Grain Industry Fund (Primary Industries Funding Scheme) which nearly all grain producers in this state contribute to. GPSA is a founding member of Primary Producers SA.

The State’s grain industries are large and diverse, making a significant contribution to the economy. Total grain production in South Australia from an estimated 3,000 grain producing businesses for 2012/13 season was 8.612 million tonnes, being predominantly wheat (5.006 million tonnes) and barley (2.126 million tonnes). South Australia produces on average 6.28 million tonnes of grain p.a. (10 year average).

Grain is grown in all the southern regions of the State from the far west of Eyre Peninsula to the Limestone Coast. About 85% of our grain is exported around the world, to locations including the Middle East, China, Japan and South East Asia. Average grain exports from SA to all export destinations are approximately 5.26 million tonnes p.a.

With an estimated farm gate value of over $2.1 billion & export value of $2.8 billion, the grains industry is a not only a major contributor to this state’s economy it is also a significant export earner for this state.

GPSA’s objectives are to improve the profitability and sustainability of South Australian grain producers through:

- Representing the views of South Australian grain producers to government, industry and the community on grains issues;
- Working with an effective state farming organisation and other commodity groups to represent South Australian grain producers on cross commodity issues;
- Working with government and industry to develop policies around creating and maintaining an efficient, accessible and cost effective supply chain;
- Working with government, industry and institutions to improve the technical and business skills of South Australian grain producers;
- Working with Research, Development and Extension organisations to identify and disseminate research priorities in grain production, handling and management;
GPSA’s contribution to the issues for consideration in the Agricultural Competitiveness Green Paper

The Agricultural Competitiveness Green Paper has provided a blueprint of current Government actions with regard to agricultural competitiveness and policy options for improving the sectors productivity and profitability. The paper has outlined 11 key policy categories with options for consideration and/or adoption. GPSA has considered the 11 policy categories and provided input where appropriate for further consideration by the Agricultural Competitiveness Task Force.

ISSUE 1 – INFRASTRUCTURE
Building efficient and cost-effective transport and communications infrastructure that will support the movement of farm inputs and outputs, reduce costs and open up new markets; and facilitating new or intensified agricultural production

Policy idea 1 – Building new transport infrastructure

South Australian grain growers are disadvantaged by the monopoly ownership of South Australia’s storage and handling facilities and port terminal capacity. The lack of competition and transparency in the supply chain system leads to higher handling costs for South Australian grain growers.

The grain storage and handling systems in South Australia are failing to provide a vigorous and competitive marketplace for grain growers. GPSA has consistently called for a review into the pricing and structure of the grain handling supply chain in South Australia, with the monopoly control of the bulk handling and port loading facilities by Viterra. This call was endorsed by the SA Parliament Select Committee Review of the Grain Handling Industry September 2012, which recommended the Essential Services Commission of SA (ESCOSA) undertake a review of the entire grain supply chain with the objective of establishing arrangements that provide the basis for pricing of, and access to, grain storage and bulk handling facilities (including up-country services) that are consistent with the requirements of a competitive and deregulated wheat export market.

A recent independent report by the Australian Export Grain Innovation Centre found supply chain costs in South Australia – the cost of getting grain from the farm to a port and on-board a vessel for export – averages about $70 a tonne for wheat, or about 30 percent of wheat’s cost of production. If we can improve the efficiency of the supply chain network with additional port facilities and improved road and rail networks that would benefit the grain industry enormously in South Australia.

GPSA was instrumental in calling for an auction system for the allocation of shipping slots from South Australian ports to give producers competition in the storage and handling system. The auction system has been a great success this year with South Australian wheat prices being $10-
$20/t higher than Western Australian prices, when in the past they had been $10/t lower. GPSA supports the new mandatory code for Port Access and will continue to strongly support the auction system moving forward under the new mandatory code.

a) Linking public and private freight lines and port infrastructure  
Support

b) Investigation into all-weather access rural roads that may increase productivity of interstate freight movement, including sealing a third east-west continental road through Central Australia.  
Support

c) Identifying air freight hubs in regional Australia as potential opportunities to significantly reduce transport times to market.  
Support

d) Examining infrastructure for ‘greenfield’ developments that may support growth in new areas and open up new opportunities for Australian farmers.  
Support

Policy idea 2 – improving existing infrastructure and transport regulation  
Support

Improving the efficiency of the transport system is critical to reducing the costs of getting grain from farm to the ports. To that end, the South Australian Government recognises this and through its Department of Primary Industries and Regions SA (PIRSA) and the Department of Planning, Transport and Infrastructure (DPTI) is partnering with Primary Producers SA¹ (PPSA), to undertake a 90 Day Project with the aim of looking at regulatory and minor infrastructure projects which can improve the viability of primary producers without compromising community safety.

A survey has been conducted on the 3 key focus areas of the project, being:

a) Extension of existing routes for various “trailer combinations”

b) First and last mile access (e.g. the section of road between a commodity route and a silo or sale yard)

c) Movement of machinery on public roads

The results of the survey are being collated and will be prioritised into those that can be actioned upon immediately and those issues that may take more time and/or resources. Action plans will be put in place for those longer term issues. We would suggest that our road freight network system would benefit enormously if a similar survey were to be undertaken by each of the States and a concerted effort be made on resolving regulatory blindspots.

GPSA would also support a review into the impact of closing up country rail lines which will result in greater road freight movements of grain. This will increasingly shift the risk and capital investment costs back to the growers and the community.

Policy idea 3 – Enhancing communications  
Support

A major issue for regional areas across South Australia, but particularly for Eyre Peninsula, is telecommunication blackspots. Many grain growers have reported to GPSA that they could not receive daily grain prices because of poor mobile coverage. Slow internet speeds meant it was hard to sell and transfer grain online. It has been estimated that poor telecommunications is costing the industry on the Eyre Peninsula in excess of $3.5 million a year, which is clearly not acceptable.

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¹ Primary Producers SA membership includes: Grain Producers SA, Livestock SA, Pork SA, Wine Grape Council of SA, Horticulture Coalition of SA, SA Dairyfarmers Association
ISSUE 2 – WORKING WITH STATES AND TERRITORIES

To deliver improved outcomes for Australian agriculture, including tackling deregulation through the Council of Australian Governments (COAG) agenda.

Policy idea 4 – State government deregulation

Deregulation to reduce red tape and duplication must be a priority. The cross over between local, state and federal government regulations and potential for duplication and inefficiencies needs to be explored and opportunities for streamlining the 3 layers of regulations considered.

a) Removing excessive native vegetation laws

GPSA supports the removal/streamlining of native vegetation laws to ensure that environmental outcomes can be achieved alongside improved farm profitability. GPSA is working with PPSA and the State Government on NRM issues through a committee established by PPSA.

b) Removing excessive work health safety (WHS) requirements

GPSA supports the removal of excessive work health and safety (WHS) requirements and moving towards a consistent approach between the States. WHS is critical but excessive requirements can lead to limited compliance/uptake by farmers due to their lack of knowledge/skills in what is required and also the time taken to fully comply with every single requirement. Assistance should be provided to enable farmers to fulfil their obligations.

c) Improving the efficiency of the native title system

Policy idea 5 – Protecting the resource base

a) Limiting the adverse impacts of mining on the agricultural sector.

GPSA has established a sub-committee, the Agricultural Security and Priority Committee (ASAP) which considers issues impacting on farmer’s rights and abilities to farm. ASAP provides an avenue for farmers affected by issues such as mining, urban encroachment and competing land uses to have access to information on their rights, access to relevant government officials and is establishing policies it will pursue with the State Government on behalf of affected farmers. The key premise of this Committee is that access to agricultural land should only be allowed with the farmer’s agreement and farmers must be entitled to appropriate compensation for access to any of their land.

b) Providing opportunities for farmers to convert leasehold land into freehold.

c) Ensuring greater consistency in biosecurity regulations between jurisdictions.

d) Quarantining prime agricultural land from mining activity

While GPSA supports quarantining “prime” agricultural land from mining, what is the definition of “prime”? Even the most marginal cropping land, if well managed, can be productive and profitable. Care needs to be taken into defining “prime” agricultural land, may need to be considered on a case by case basis.

Policy idea 6 – Strengthening farm businesses

GPSA supports measure that will help to strengthen the financial and resource base of farms.

a) Implementing a nationally consistent and mandatory approach to farm debt mediation.
Rural Business Support SA has provided invaluable assistance to farmers wishing to exit farming due to financial constraints. We would support further assistance being provided to prevent farmers being put in the situation of needing to exit farming due to financial pressures.

b) Subsidising farm energy audits. Support 
GPSA would support SA farmers being able to access off-peak energy and being charged accordingly.

c) Streamlining development application processes. Support 
Provided it doesn’t add to the cost or reduce farmer’s right to farm in the face of competing/conflicting land uses.

d) Enforcing animal welfare legislation, as well as strengthening laws to stop trespass on farms.

e) Adopting the Co-operative National Law

ISSUE 3 – COMPETITION AND REGULATION
Giving farmers the best chance to earn a fair return on investment by ensuring fairness and transparency in the supply chain; making sure that unnecessary red and green tape is removed and that necessary regulation creates the least possible costs for businesses and individuals.

Policy idea 7 – Improving market competition Support

a) Introduce options to increase price transparency throughout the domestic supply chain
The grain storage and handling systems in South Australia are failing to provide a vigorous and competitive marketplace for grain growers. GPSA has consistently called for a review into the pricing and structure of the grain handling supply chain in South Australia, with the monopoly control of the bulk handling and port loading facilities by Viterra. This call was endorsed by the SA Parliament Select Committee Review of the Grain Handling Industry September 2012, which recommended a review be undertaken of the entire grain supply chain with the objective of establishing arrangements that provide the basis for pricing of and access to grain storage and bulk handling facilities (including up-country services) that are consistent with the requirements of a competitive and deregulated wheat export market.

Despite deregulation of wheat export markets, the fact remains that South Australian farmers will not be able to fully exploit the opportunities that deregulation should provide.

b) Introduce new marketing mechanisms which might restore balance of power to the producer.
We support the intent of this policy but believe consideration must be given to consumer driven supply chains. While most grain is traded as a bulk commodity there is little or no feedback given to participants in the supply chain, especially the growers, as to what the customer desired and what was delivered. Feedback back up the chain is limited to pricing signals on grain quality at the delivery point, not on grain performance at the end use. There is a limit to farmer’s access to timely, relevant and accurate information from the consumer to help drive/inform production decisions.

c) Facilitate greater use of cooperative structures.
Policy idea 8 – Strengthening competition laws

GPSA has made a submission to the Competition Policy Review (CPR) - draft report of September 2014 and in principle supports the report which encourages a competitive and more level playing field for Agriculture in general and grain production specifically.

a) Revisions to the CCA
   We support draft recommendation 25 in the CPR – Misuse of market power, which “would allow for the provision to be simplified”

b) Reviewing competition laws to consider whether there are any barriers to greater consolidation among agribusiness firms
   We support draft recommendation 30 in the CPR – Mergers, “with the objective of timely decisions”

c) Increasing the resources of the ACCC
   We support draft recommendation 49 in the CPR – Small business access to remedies, resourcing of the ACCC should allow it to test the law on a regular basis to ensure the law is acting as a deterrent to unlawful behaviour”.

d) Creating a supermarket ombudsman with penalty powers and a mandatory code of conduct for supermarkets (across all commodities) backed by direct financial penalties
   We support as a minimum a voluntary code of conduct.

Policy idea 9 – Improved regulation

Deregulation to reduce red tape and duplication must be a priority. The cross over between local, state and federal government regulations and potential for duplication and inefficiencies needs to be explored and opportunities for streamlining the 3 layers of regulations considered. GPSA supports the removal of duplicated or unnecessary regulation and the review of all regulatory burdens placed on farm businesses with the aim of simplification.

a) AgVet chemicals regulation
   Simplifying regulations in the area of Agricultural and veterinary chemicals is required.

b) Country of origin labelling for food
   Support

ISSUE 4 – FINANCE, BUSINESS STRUCTURES AND TAXATION

Improving access to finance; providing access to reliable independent business information and advice; and ensuring that the tax system appropriately encourages investment.

Policy idea 10 – Improving access to finance

a) Permanent concessional lending
   The Concessional Loans scheme has proved very helpful in assisting farmers to restructure their debt. Making the scheme permanent may distort the financial market and encourage farmers to take on more debt. GPSA supports a continuation of the concessional loans scheme to long term viable farmers, possibly managed by adjusting entry criteria. However, support should be equitable to all within a drought affected area. Commercial loans and the use of Farm Management Deposits will also form an important part of the blend of financial products farmers have available.

b) Incentives for institutional investment in agriculture
   Consideration should be given to new superannuation products for farm investment that provide equity capital to farm businesses for farms to adopt productivity improvement measures or to increase in scale. Public private partnerships in terms of investment in new products and financial services should also be considered. Many farmers may not be investment ready, but with assistance may be able to become open to capital injections through investors. This needs to be addressed urgently as potential
investors are turned away by the general lack of preparedness of farmers for such capital injections. However, some investors also see stamp duty as a barrier to this type of investment.

**Policy idea 11 – Improving tax system efficiency and equity**

- **a)** Non-commercial loss rules
- **b)** Increasing thresholds for the Farm Management Deposits Scheme

GPSA supports both increasing the $400,000 deposit limit on FMD and also in changing the taxation principles applying to trusts and companies to enable trusts and companies to hold an FMD. Both changes to the FMD scheme would enable farmers to hold profits over a financial year for the purpose of being able to reinvest back into the business.

GPSA would also support the reintroduction of the early access provisions in times of drought, enabling farmers to withdraw their funds within 12 months of deposit if a drought or other seasonal circumstances warrant it without losing the tax benefits of the scheme.

- **c)** Depreciating farm plant and equipment
- **d)** Zone Tax Offset
- **e)** Tax loss trading
- **f)** Income tax averaging

Enabling farmers to opt in and out of this scheme as business circumstances change could help farmers to manage the variability of their income.

- **g)** Wine Equalisation Tax

**Policy idea 12 – Farm business improvement**

- **a)** Business advice

GPSA supports the need to provide increased access to farm business advice from independent experts. Peer review through widening of the Entrepreneurs Infrastructure Programme to include farms would be a positive move.

- **b)** Rural Financial Counselling Service (RFCS)

GPSA supports the expansion of the RFCS from primarily providing farm exit advice/support to becoming a first point of contact and referral service for all agricultural businesses to assist farmers to access business and wellbeing support services with the aim of improving their businesses sustainability.

- **c)** Collaboration programme

GPSA supports farm businesses in being able to collaborate to improve their bargaining position and generate economies of scale. The South Australian Government, through PIRSA, is investing in a cluster programme which encourages businesses with similar business requirements to cluster together to foster collaboration and innovation.

**ISSUE 5 – FOREIGN INVESTMENT**

Encouraging responsible foreign investment to build new production capacity; and ensuring the foreign investment regulatory framework takes into account the needs of the agriculture sector.

**Policy idea 13 – Improving the transparency of foreign investment**

GPSA supports the development of the register of current foreign ownership of agricultural land and should include the size and value of the land holdings. Also, when considering foreign investment issues, do we need to consider the degree of subsidisation that entities receive in other countries and the potential impact that has on our competitiveness for that foreign investment dollar?

There is also the issue of business resilience of foreign owned farm from receiving overseas funds during poor seasons at the detriment of family farms i.e foreign owned farms can be propped up in times of drought by overseas dollars while family farms have no such resources.
Rules around stock swaps and transfer pricing need to be considered to ensure a level playing field because an overseas business would be able to offshore some of their profits.

**ISSUE 6 – EDUCATION, SKILLS AND TRAINING, AND LABOUR**

Ensuring agriculture is well covered in our education system; making education more accessible for children in remote areas; increasing skills of new and existing workers; enabling access to a flexible workforce; and attracting new entrants into agriculture.

**Policy idea 14 – Strengthening agricultural education**

- **Support**
  
  **a)** Working with the State and Territories to provide specialised learning in agriculture in the future.
  
  **b)** South Australia requires further investment in the development of specialised agricultural high schools such as Urrbrae, in particular in regional centres. Agriculture should be included in all schools as part of the standard curriculum as well. Further work needs to be done on attracting students and new entrants into agricultural industries, especially in the area of the raising awareness as to the huge range of career options available in agriculture. Establishing a young farmers mentoring and networking programme
  
  **Support**
  
  GPSA supports the development of such a programme. Providing opportunities for young farmers to network and have access to mentors can facilitate in the attraction and retention of young people into farming.
  
  **c)** Increasing financial support for regional education
  
  **Support**
  
  **d)** Creating national agricultural tertiary centres of excellence
  
  **Support**
  
  GPSA supports such an initiative and the importance of tertiary education and development. To that end, GPSA is sponsoring the Peter Waite Scholarship initiative at a level of $30,000 per annum and have committed to maintaining that support for 5 years. The PhD Scholarship will support a recipient in the area of Global Food and Agriculture.
  
  The Peter Waite Centenary Scholarship for Excellence in Agriculture is an initiative arising from the centenary celebration of Peter Waite’s letter to the government informing them of his gift of the land on which the Waite Campus is developed. The scholarship is aimed to support a PhD student who is studying at the Waite Campus in the area of Agriculture and is clearly aimed at attracting excellence which would fit the Waite name.
  
  Government support of industry involvement in scholarship schemes such as this would further strengthen the retention and attraction of students to undertake tertiary studies in the area of agriculture.

**Policy idea 15 – Strengthening labour availability**

- **Support**
  
  **a)** Expand the Working Holiday Maker (417) visa
  
  **Support**
  
  **b)** Broaden the skills coverage of the Temporary Work (Skilled) visa (subclause 457)
  
  **Support**
  
  **c)** Expand the Seasonal Worker Program
  
  **Support**
  
  **d)** Streamline application processes
  
  **Support**
  
  **e)** Provide clear pathways to residency
  
  **Support**

**ISSUE 7 – DROUGHT**

Building resilience and risk management capability; and providing appropriate support to farm families and otherwise viable farm businesses suffering severe drought.

**Policy idea 16 – Increasing drought preparedness**

- **Support**
  
  **a)** Introducing accelerated depreciation for new water and fodder infrastructure
  
  **Support**
  
  Being able to claim 100% of the depreciation from investment in water and fodder infrastructure would enable farmers to make the investment and claim a larger tax deduction
in the same financial year as they make the investment. GPSA believes this would assist farmers in being able to prepare and financially manage for drought years.

b) Encouraging multi-peril crop insurance

Support

Providing assistance/grants to cover the upfront costs of the assessment process may encourage more farmers to consider taking out such insurance as a risk management tool to at least cover their cost of production. This may be particularly appealing to farmers with a high debt burden, where meeting costs of production is essential if they are even to service their debt. But at the end of the day, the premiums payable and the cover provided need to be cost effective and meet the farm business risk management requirements. However, mechanisms would need to be put in place to ensure that government support for such schemes doesn’t lead to inefficient policy premiums lining the pockets of insurance companies. Reduction or removal of the stamp duty paid on such insurance products would also help make them more affordable.

c) Improving climate information

Support

Policy idea 17 – In drought support

Policy idea 17 – In drought support

a) Additional mental health support in times of drought

Support

GPSA supports the need for better access to support services in times of drought. However, access to these services should not be reliant on the triggering of a drought. Mental health statistics within rural and remote areas have been on the increase over the last ten years and are not just triggered by extreme weather conditions such as drought. More resources should be put into providing access to mental health services generally, not just when disaster strikes.

b) Provision of additional assistance for prolonged and severe drought

Support

GPSA believes that eligibility for drought support should be made on a case by case basis, not just regionally as extreme variations in conditions can sometimes occur from one farm to the next. Drought support should also be extended to at least one production year past the period of the drought to enable farms to restock/recover and have cash/resources to actually plant the following year’s production.

When the government sets criteria for determining whether a drought is declared and the severity, then there needs to be some flexibility in the criteria and the programmes available that can target both regional and individual needs. Also needs to be some alignment of drought policy/declarations between the States and Territories.

 ISSUE 8 – WATER AND NATURAL RESOURCE MANAGEMENT

Identifying and building the water infrastructure needed for Australia’s future water supply needs; ensuring sustainable and productive use of natural resources for economic growth and development; improving our knowledge of sustainable resources use; and managing weeds and pests.

Policy idea 18 – Improving water infrastructure and markets

Support

Policy idea 18 – Improving water infrastructure and markets

a) Dams and water infrastructure

b) Tax concessions for water reticulation infrastructure

c) Water markets

Policy idea 19 – Natural resource management initiatives

Support

Policy idea 19 – Natural resource management initiatives

a) Amending the Environmental Protection and Biodiversity Conservation (EPBC) Act 1999

b) More targeted pest and disease management and control
ISSUE 9 – RESEARCH, DEVELOPMENT AND EXTENSION
Boosting productivity through strategic and coordinated research and development; making sure that farmers can apply the latest innovations through ensuring effective extension of new knowledge and technology.

Policy idea 20 – Strengthening the R, D & E system

a) Updating the rural RD&E priorities to better align with community needs
GPSA strongly supports the need for further investment in RD&E, and believes that the potential for Public Private Partnerships should be explored with regard to investment in RD&E. Improving productivity on farm and along the supply chain through investment in RD&E will be essential if Australia is to maintain a competitive edge over major competitors in existing and new markets.

However, there is limited value in conducting advanced technology research and development if the outcomes of the research are constrained in their ability to be fully utilised by State regulations. To that end, the reasoning behind the South Australian Governments moratorium on GM crops needs to be openly debated and the facts considered. This has constrained the ability of South Australian farmers to adopt the latest technology to improve their productivity and profitability. (see also CPR Box 8.2 page 76)

b) Establishing a new body, or tasking existing research bodies, to coordinate cross-sector research
Is a new body really necessary or is it more a case of better coordination between existing research bodies via forums/workshops/access to shared funding etc.

c) Enhancing access to the R&D tax incentive
Support

d) Promoting the development of extension services
Support
Extension services are critical for the practical uptake of R&D by farmers and industry. Funds from each research project should be allocated against extension services and GPSA would support the Federal Government allocating additional funds to assist in the development of the extension market. However, there are many industry and farmer groups currently engaged in extension services, the critical issue is linking them effectively with researchers and also ensuring some form of quality control is in place.

e) Decentralising Government agricultural research functions (such as RDC’s and agencies of the Department of Agriculture) to regional areas as appropriate.
Decentralising for the sake of decentralising is not necessarily the answer to get a closer alignment between researchers and farmers. Attraction of appropriately skilled research staff may prove more difficult. Creation of regional research hubs through co-location with universities and other research providers could provide the solution in terms of creating critical mass and increased innovation and research opportunities which in turn would help to attract skilled scientists.

f) Regular five-yearly assessments of the RD&E system
Support
Provided the assessments don’t take funds and resources from doing research to doing the assessments.

Policy idea 21 – Improving the rural RDC’s

a) Administrative changes to the RDC model to increase transparency and reduce costs, including giving the RDC a targeted set of objectives.

b) Increasing the flexibility of levy arrangements
Support
A system needs to be put in place where levy payers have a mechanism to review and set levy rates and also help determine what the levy is used for. Could be via an annual survey.
ISSUE 10 – BIOSECURITY
Protecting our favourable animal and plant health status to maintain productivity and access to export markets.

Policy idea 22 – Improving legislation  
Policy idea 23 – Improving the biosecurity system  
  a) Increased information and intelligence gathering tools, supported by increased investment on high risk areas and priority pests and diseases.  
  b) Enhanced onshore monitoring, including by developing reporting tools and establishing a public Biosecurity Information System to share information  
  c) Collaborating with industry associations to extend traceability systems to better facilitate responses to outbreaks and expand market access

Support

ISSUE 11 - ACCESSING INTERNATIONAL MARKETS
Giving our exporters the best chance of capturing high-value markets through addressing technical barriers to trade and ensuring trade negotiations deliver real commercial benefits for the sector; and, by doing so, contributing to global food security.

Policy idea 24 – Strengthening Australia’s overseas market efforts
GPSA supports the intent of this policy but believe consideration must be given to consumer driven supply chains. While most grain is traded as a bulk commodity there is little or no feedback given to participants in the supply chain, especially the growers, as to what the customer desired and what was delivered. Feedback back up the chain is limited to pricing signals on grain quality at the delivery point, not on grain performance at the end use.

a) Undertaking further trade research  
   While a plethora of trade information is available, it’s often very technical and detailed. Providing access to concise, relevant and easy to understand data is the key. There is a limit to farmer’s access to timely, relevant and accurate information from the consumer to help drive/inform production decisions.

b) Improving exporter services and understanding of overseas markets

c) Providing more exporter readiness training  
   Many State Governments invest in trade delegations to major export markets with industry as a way of providing some form of exporter readiness training. A more coordinated approach across the States or by the Federal Government could help pool limited resources and provide growers with more opportunities to access training in becoming export ready.

d) Accelerating the development of technical, market access country and commodity strategies to prioritise market access efforts.  
   It seems that each State and Territory has country and commodity strategies, in South Australia the Government has focused on China and India. Again, pooling these efforts across the States could reduce the duplication in effort that is currently occurring.
e) Developing national promotion efforts (such as through a national brand)  
   Support  
   Such a brand would need real buy-in by the States and key industry and commodity groups to work.

f) Increasing Australian Government positions overseas, and considering options for industry funded positions to underpin increased focus on agricultural market access  
   Support  
   While we appreciate the limited resources within Austrade to address some of the key industry and market access issues, industry already pays for these services. Asking industry to pay for additional resources within Government organisations may be seen as double dipping. Industry may see it as more cost effective to simply employ their own resources within target markets rather than pay for an employee in a government entity.

g) Increasing engagement bilaterally, and in multilateral forums, to promote use of international standards in food regulation  
   Support  

Policy idea 25 – Improving Australia’s export and import systems  
   Support  
   In particular, reducing the cost compliance to maintain our competitiveness in international markets.