



SUBMISSION

Grain Producers Australia

Feedback for the Property Identification Code Working Group

15 November 2019

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Property Identification Code Working Group
Australian Government
Department of Agriculture
Canberra ACT 2601



PO Box 370
BRAIDWOOD NSW 2662

Re: Grain Producers Australia Feedback – Property ID Code

Grain Producers Australia thanks the Property Identification Code Working Group for the opportunity to provide comments.

In principle, GPA support the development of a nationally consistent scheme for property ID reforms. Grain Producers Australia support a nationally consistent scheme for property identification, preventing duplication, while also protecting the interest of farmers and the wider agricultural industry.

However, GPA do not consider that there has been adequate work done to address the complexities of a PIC system for the grains industry, while also working through a supply chain traceability system. The working group also needs to develop or make available information on the opportunities, costs, and how the information will be used, managed, tracked, accessed and stored to maintain the integrity of industry.

The potential opportunities for the grains industry in the report are supported by GPA, including managing pest and disease outbreaks, managing food safety, trade and market access requirements, and addressing consumer interest in product sustainability, ethics and provenance. However, there has been limited information provided on how a PIC system will meet these requirements and manage the issues. There also needs to be consideration for how a grains traceability scheme will work with existing identification programs, such as NGR or levy payer database.

A property ID code system and a traceability system for the grains industry need to consider the complexities of the industry:

- Grain is sold and used as a comingled, bulk commodity
- There are multiple points of transactions throughout the supply chain; loading for transport off farm, delivery to a receival site, outturn from site, delivery to port or processing facility
- There are multiple points of change of ownership or management of the grain

A property ID code could be used for traceability; however it is a component of a traceability scheme.

With implementing a PIC scheme across a number of commodities, there has been no evidence provided on how the grains industry will be impacted or benefit from the PIC. There is significant grower concern for ensuring that any changes to the industry will deliver a clear cost-benefit and value for growers. There also needs to be adequate protections for the information held within a central system. The property ID code needs to be assigned to a geographical location, not a property owner or business address.

The implementation of a plant sector PIC system should be considered independently of a national traceability project. Traceability in the grain industry has additional considerations, given the bulk and blended commodity system that operates within Australia.

There needs to be work done to ensure that there is no duplication of existing systems, no significant cost to implement or manage the system to growers, while also giving benefits for both growers and the industry.

Objectives

Grain Producers Australia would prefer the following outcomes from the consultation:

- Develop the value proposition, regulatory impact statement, cost-benefit analysis and purpose for a property ID code system for the grains industry.
- Clear separation of a PIC system to a grains industry traceability scheme.
- Cost benefit analysis for a PIC system and opportunities for the grains industry.
- Additional information on the principles and purpose of each aspect of the PIC proposal, reform principles and implementation.

Comments on the PIC reform principles

There will be a consistent property identification approach across animal (livestock) and plant industries, to the extent practicable.

GPA support a nationally consistent scheme across all commodities. Duplication of systems and resources will result in inefficiencies and potential system failure. Multiple commodities need to be on a single system to maximise opportunities and simplify compliance and outcomes.

Harmonisation needs to deliver clear benefits to all impacted industries. The consistency should deliver on the outcomes and not be harmonisation for the sake of it.

A property will consist of one or more contiguous parcel(s) of land operated as a single business under the same ownership/management arrangement.

GPA support a PIC being against a parcel/s of land. The opportunities with a PIC system can only be used if an area of land is identifiable, particularly in response to a biosecurity incident. A business that owns/operates multiple parcels of land over a large area would require separate PIC's. The separation of land and businesses would be beneficial in the event of a biosecurity incursion that could result in a shutdown scenario.

There is to be a unique property identifier establishing the physical location of the property.

GPA support the PIC being allocated to a geographical and physical location. It is important in the event of an incursion to be able to physically identify both land and owners efficiently.

An area of land comprising a property should be defined by a unique geospatial identifier.

GPA support the use of geospatial identifiers.

A property identifier will be mandatory for properties used for:

- **Keeping livestock**
- **growing/propagating plants**
- **within the supply chain for domestic consumption or export.**

GPA agrees that all participants of the supply chain need to be identifiable under a nationally consistent PIC system. However, there needs to be a clear purpose on how the PIC system will be used, clarity on the obligations and responsibilities of all supply chain parties.

There also needs to be significant work completed on the technical considerations and implementation for an end-to-end supply chain traceability scheme for the grains industry.

Property identifier data must include:

- a) property owner and contact details;**
- b) property street address;**
- c) the type(s) of enterprise(s) being conducted;**
- d) plant products on property;**
- e) associated enterprise ownership details;**
- f) pest and disease status.**

There needs to be additional information from the Department and Working Group on the purpose that each of the identifier data would serve. The value proposition for the PIC system needs to clearly articulate how the information will be used, and what purpose of the system is.

There needs to be clarity on how production information will be used, accessed and managed. There also needs to be a cost-benefit analysis completed on the level of detail and accuracy required to achieve the objectives of a PIC and traceability system. There is limited information on what level of detail is required to meet the purposes. The separation of land ownership compared to land management is also required, as there are a number of scenarios that require the separate data. There would also need to be consideration for how a PIC system will identify crown or government owned land in the event of incursion management.

Data is to be updated regularly.

GPA agree that information should be kept current. There needs to be consideration for how often is required to meet the purpose of the data.

In the event of a biosecurity/food safety emergency, the property identifier, and associated data, is to be shared to the maximum amount permitted, consistent with privacy legislation, amongst the Commonwealth, states, territories, research laboratories and industry, as appropriate.

There needs to be consideration given to how the data collected will be used in the event of an emergency. Particularly what information is required to meet biosecurity obligations, how information will be used, potential trade implications, communications, and access to information. There also needs to be consideration for how a biosecurity response would impact on the PIC for other commodities – i.e. access to feed for livestock in event of plant industry shutdown.

The property identifier and associated data is to be provided to, and integrate with, plant traceability arrangements, and export certification.

There needs to be a clear value proposition for the grains industry and for growers. There also needs to be additional information provided on a traceability system.

Governance arrangements that identify roles and responsibilities of system participants and ensure consistency of implementation are to be established. This will include the Australian Government, state and territory governments and industry.

GPA agree there needs to be clarity in roles and responsibilities for all participants.

Additional considerations

The Department and Working Group need to provide additional information and consideration to the following.

- There needs to be a clear value proposition for the grains industry in implementing a PIC system. There is no information provided by the department on how a PIC system and grains industry traceability system would deliver value for growers, the market or the industry overall.
- While a PIC system is a separate system, there needs to be consideration to how a traceability system for the Australian grains industry would work, particularly with multiple points of ownership, comingling, transport and other complexities.

- The purpose and objectives for a property ID code system for the grains industry, including how a comingled and bulk commodity would have an end-to-end traceability system.
- How multiple supply chain participants, each with separate PIC's, would use PIC's in the event of a traceability system.
- There needs to be additional research on the costs and benefits of a PIC and traceability system, as there is a lack of insight available from the Department on drivers for the national harmonized scheme for the grains industry. There is a potential for the PIC scheme to become unnecessary regulations that do not deliver on the objectives for biosecurity, food safety, quality assurance and traceability.
- There are potential implications for the adaption of the existing systems compared to the implementation of a new system. There needs to be consideration to how separate, existing identification systems can work together, such as NGR, levy payer database.

GPA would welcome the opportunity to work with the Department on developing and refining the property ID code implementation strategy. If you would like to discuss any of these comments and suggestions further, please contact myself at andrew.weidemann@grainproducers.com.au or 0428 504 544, or Maddison McNeil at maddison.mcneil@grainproducers.com.au or 0432 988 694.

Yours sincerely,

Andrew Weidemann
Chairman
Grain Producers Australia

Background on GPA

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 Organisation including:

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

GPA¹ 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).

¹ Further information on GPA: <https://www.grainproducers.com.au/>