



7 October 2025

Joint Standing Committee on Trade and Investment Growth
CANBERRA ACT 2600
Via online portal

To whom it may concern,

Re: Creating sustainable economic growth in rural and regional Australia

GrainGrowers welcomes the opportunity to provide a submission to the Inquiry into creating sustainable economic growth in rural and regional Australia.

GrainGrowers is a national organisation working to enhance the profitability and sustainability of Australian grain growers. GrainGrowers achieves this through focus areas of policy and advocacy, grower engagement, thought leadership and active investment in future focused activities for all growers. Australian growers are at the heart of all that GrainGrowers does and the focus of its work.

GrainGrowers supports improving domestic and international marketing efforts to promote Australia's 'clean and green' agriculture to increase profitability for grain growers, strengthen Australia's market position as a leading supplier of high-quality clean and sustainable agricultural products, and to future-proof the sector ensuring Australian growers remain competitive, resilient and adaptable to evolving market demands and climate change impacts. To achieve this, GrainGrowers has identified four key considerations for the Inquiry, including:

- Increased recognition and support for the Grain Sustainability Framework
- Industry-led traceability and certification schemes rather than top-down approaches
- Sustainable funding for the Agricultural Counsellors Network
- Investment in low-emissions research and development

Support for the Grain Sustainability Framework

Improving international market access for Australian agricultural products requires credible, industry driven sustainability credentials. The Grain Sustainability Framework (GSF) is a key initiative that supports this goal by providing a consistent and evidence-based approach to measuring and improving the sustainability performance of Australian grain.

Developed by the industry, the GSF helps position Australian grain as a trusted and responsible choice for global buyers. It addresses environmental, social, and economic priorities, enabling the sector to demonstrate its commitment to sustainable production and meet the expectations of increasingly discerning markets.

With recognition and support from government, the GSF can further strengthen Australia's reputation as a leader in sustainable agriculture. This will help secure long-term access to

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international markets, enhance competitiveness, and ensure the grain industry remains well-positioned in a rapidly evolving global food system.

Traceability and certifications

Sustainability credentials are growing in importance for accessing certain markets for Australian grains. Where traceability and certifications schemes are developed to meet market expectations or support domestic and international marketing efforts, GrainGrowers seeks to ensure they are industry-led rather than top-down approaches that may not be reflective of Australia's unique agriculture sector.

Sustainability certification schemes are already in place for key grain export markets and while they are often voluntary, they can quickly become a market expectation as is the case for the International Sustainability and Carbon Certification (ISCC), which is required for biofuels entering the European Union (EU). As these schemes proliferate (such as the United States Renewable Fuel Standard and the EU's Union Database for Biofuels) Australia must ensure that key commodities are not arbitrarily precluded.

Sustainability traceability and certifications to meet market expectations must be driven by the market and must focus on what value it provides supply chains, avoiding perverse outcomes such as exclusion from key grain export markets or regulatory fragmentation. Sustainability traceability and certification mechanisms cannot be a one-size-fits-all approach and will need to reflect the unique requirements of the Australian grain industry, requiring open dialogue to ensure the systems are adaptable.

The assumption that implementing traceability and certification for sustainability credentials will earn a premium for growers may not always hold true, especially for commodities like grain where provenance is less of a market differentiator. This raises concerns about whether the investments required will provide a clear value proposition for growers, highlighting the need for industry-led approaches that focus on tangible benefits across the supply chain.

Sustainable funding for the Agricultural Counsellors Network

Maintaining robust international representation is crucial for the Australian grain industry to navigate the complex global trade environment and safeguard market access, particularly with increasing market expectations regarding sustainability criteria. GrainGrowers seeks sustainable funding for the Agricultural Counsellors Network and the reinstatement of a Special Representative for Australian Agriculture (or a similar role) as essential strategies in this regard.

The Agricultural Counsellors Network plays a vital role in maintaining trade relationships, resolving on-the-ground trade issues, and reducing the risks associated with Australia's trade exposure. These Counsellors provide invaluable insights to the industry and serve as an active conduit for maintaining relationships for Australian agriculture. Securing dedicated and long-term funding for this essential network ensures that Australia maintains a strong presence in key international markets.

Further, the reinstatement of a Special Representative for Australian Agriculture (or a similar role) can further strengthen the industry's global advocacy. This position can serve as a dedicated voice, championing the agricultural sector's sustainability and advocating for improved global market access. By leveraging this high-level representation, the government can effectively navigate the evolving trade landscape and strengthen international partnerships, safeguarding the interests of the grain industry.

Investment in low-emissions research and development

The Australian grain industry's commitment to sustainable and low-emissions farming practices offers a significant opportunity to strengthen its global competitiveness and market access. GrainGrowers seeks policies that support Australian growers in maintaining their position as global leaders in low-emissions grain production.

Policies that support innovation and the adoption of new technologies are essential to maintain the grain industry's sustainability credentials. Given the absence of affordable, low-emissions technologies available at scale, research and development is crucial. By facilitating the commercialisation and uptake of low-emissions technologies, the government can enable growers to continuously improve their sustainability performance.

By addressing these key considerations - support for the GSF, industry-led traceability and certification schemes, sustainable funding for international representation, and investment in low-emissions research and development - the Australian grain industry can strengthen its position as a global leader in sustainable agriculture and enhance market access in a rapidly evolving global market.

GrainGrowers looks forward to working with the Joint Standing Committee on Trade and Investment Growth on this topic. Should we be able to provide further assistance or if there are any enquiries relating to this submission please contact Rebecca Hurst – Policy Manager, Sustainability and Natural Resource Management at [REDACTED]

Yours sincerely,

[REDACTED]

Zach Whale
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