

AUSTRALIAN GRAIN HARVESTERS ASSOCIATION INC

ABN: 68050677224



President: Peter Bradley 20 Barklay Court Benaraby 4680. Ph 0749750557

Secretary: Mick Crowe. PO Box 344 Cowra 2794. Ph. 0263424121

Treasurer: Rod Gribble PO Box 555 Yenda 2681. Ph 0269681741

Administrator: Deborah Baldwin PO Box 901 Bathurst 2795. Ph 0263342715
Email info@agha.org.au
www.agha.org.au

GM Crop Moratorium Review Secretariat
NSW Department of Primary Industries
Locked Bag 21
ORANGE NSW 2800
Fax: 02 6391 3167
gmcrops.review@dpi.nsw.gov.au

Chairman & panel members.

The introduction of GM canola into Australia's grain industry will impose significant operational problems, create additional expense & ignite the very real predicament of legal liability for our members. It is well recognised from all those with any practical experience in grain growing & handling, that there will be an inevitable spread of GM canola onto & into, our customers – the grain growers of Australia – farms or supply chain(s). Many of our clients have been quite adamant that if GM canola comes in & our headers have been in any GM crops they do not want us on their properties no matter what hygiene assurances are given whether verbal or formal.

This will result in a severe restriction in our terms of trade. Investment in this vital service industry (professional contract harvesting) will cease, without a guaranteed & an unequivocal legal liability exemption from all those in the supply chain of the Australian grains industry.

AGHA has been at the forefront in advancing the interests of its members for over 30 years whilst at the same time working & co-operating with the grains industry of Australia. With this in mind, AGHA has demonstrated our practical involvement in working through all issues raised by the possible introduction of GM canola in developing a set of harvesting guidelines known as "Workable & Practical Operational Harvester Hygiene", that may, given time, understanding & consideration from both growers (GM or non-GM) & professional contract harvesters, the methods or tools to work in an environment of co-existence of supply.

As previously stated many times, AGHA is not for, nor against the introduction of GM crops into Australia provided & inclusive of all or any, be it the introduction, the growing, the windrowing, the harvesting & the freight of such crops does not harm, hinder, prohibit, impede, incur additional expense, arise demand, claim, cause of action, verdict, judgment or damages, losses, expenses in any way whatsoever, to our members or their businesses.

It is indeed up to all those associated with the grains industry & the public to be aware of all issues as to the proposed introduction of GM canola & come to an agreement or acceptance of all aspects of GM canola onto the Australian grains industry before the moratorium is lifted. If the moratorium is to be lifted for the 2008 season, AGHA will recommend that our "Workable & Practical Operational Harvester Hygiene" be used as the baseline standard when harvesting in

an environment of GM & non-GM canola along with the guaranteed & unequivocal legal liability exemption. We must have absolute certainty & confidence that we will not be sued or discriminated against for any spread or contamination of grains or property, when & if GM canola is introduced.

Please find attached the "Workable & Practical Operational Harvester Hygiene" guidelines that harvesters may use in the event of GM canola being introduced into Australia. As stated on the form, this set of guidelines is not equivalent to a "border crossing" or a "seed grade" clean down. Also attached is a schedule of the costs associated that will be charged to the GM grower for such a clean down. The example used is a Class 6 machine.

AGHA trusts this review committee will take on board & address the issues & recommendations we have presented. Thank you for inviting AGHA to again be involved in another GM canola review. Should the review committee require any further information please contact myself Rod Gribble, Brett Drysdale or Peter Bradley.

Yours sincerely,

Rod Gribble
rc.gribble@bigpond.com

Brett Drysdale
bdry6400@bigpond.net.au

Peter Bradley
woolaroo@bigpond.com.au

30th July 2007.

“Workable & Practical Operational Harvester Hygiene”.

Guidelines to Header Hygiene when Harvesting GM crops then harvesting Non GM & GM Free crops.

In an environment of “Co-existence of supply chains”, consideration should be given when moving harvest machinery from crop to crop & especially from farm to farm.

The following is a check-list of awareness & procedure to be used as the guideline for Harvester Hygiene in a GM environment.

1. Be familiar with your operator’s manual & read the sections on machine hygiene.
2. Wear all safety gear required i.e. goggles, overalls, dust mask etc.
3. Remove cross auger bottom covers (if fitted), elevator doors, grain tank doors, unloading auger doors or covers, undo & clean out rock trap.
4. Check straw walkers for any plugging with crop material, clean if necessary.
5. Blow down machine (external) with air compressor or leaf blower or brush down areas that may harbour crop material, including the front.
6. Run machine, including unloading auger for at least 2 minutes with items in point 3 open. **Warning! Sound horn, lock park brake & make sure everyone is at a safe distance before starting machine.**
7. Stop machine, turn off engine & inspect machine.
8. Replace all covers & doors on machine as per the operator’s manual.

Note: This procedure may reduce the level of contamination. It is for harvesters moving from GM crops to Non GM or GM Free crops only. This is not equivalent to a “border crossing” clean down. If you are moving into organic crops, seed crops or any other crop that the crop owner or representative requires a higher standard of hygiene, you are advised to ask what standard you are required to adhere to. Costs associated with this clean down are to be born by the GM grower.

This is not to be used as the basis for harvesting in a GM environment without written consent & approval from AGHA.

“Workable & Practical Harvester Hygiene” has been developed by Australian Grain Harvesters Association Inc. AGHA reserves the right to make changes to these guidelines as it sees fit & may do so without notification.

No part of this document may be re-produced or copied without written consent from AGHA.

AGHA COST ANALYSIS FOR PRACTICAL CLEAN DOWN PROCEDURE FOR GM CANOLA COMPLIANCE.

Clean down procedure time: 1.5 Hours, depending on make and model, familiarity, experience, length of time between procedures, weather conditions etc.

Cleaner/Driver - labour	\$26.00/hr	1.5	\$39.00
Dust Allowance	\$5.50/hr	1.5	\$8.25
Superannuation & Workcover		@ 20.0%	\$9.45
Disposable Hooded overalls	\$9.00/item	1	\$9.00
Disposable Dust mask	\$8.50/item	1	\$8.50
Goggles	\$9.00/item	0.5	\$4.50
100 CFM Compressor (1)			
Compressor use (1)	\$35.00/hr	1.25	\$43.75
Fuel (1)	\$1.35/ltr	10	\$13.50
R&M (1)	\$2.00/hr	1.25	\$2.50
TOTAL OPERATING EXPENSES			\$138.45
LOST OPPORTUNITY COSTS	(2) \$400.00/hr	1.5	\$600.00
TOTAL CLEAN DOWN EXPENSES			\$738.45

(1) If grower supplies large capacity compressor these costs are not charged.

(2) Class 6 machine operating expenses.

No part of this document may be re-produced or copied without written consent from AGHA.