



National Growers Register Pty Ltd  
PO Box 3526  
Toowoomba Village Fair  
Qld 4350  
[admin@ngr.com.au](mailto:admin@ngr.com.au)

26/9/11

To Whom It May Concern:

RE: End Point Royalty Harvest Declaration Forms

It has been brought to our attention by several of our Agricultural Bureau of SA members that the completion of the current EPR Declaration Forms can be quite a lengthy undertaking.

While the SA Advisory Board of Agriculture, the governing body for the Agricultural Bureau of SA, is strongly supportive of the collection of EPR towards financing our plant breeders, we believe that some improvement to the reporting expected of growers may increase the completion and accuracy of the Declaration Forms.

We have reports of growers taking up to 5 hours to complete these forms. Many growers produce a range of varieties all incurring varying rates of EPR, and sell to a multitude of grain traders.

EPR Reporting is complicated by the fact that traders do not generally have a standard Recipient Created Tax Invoice (RCTI) clearly identifying EPR in the same manner. A standard reporting of EPR deducted on these invoices would decrease the workload of growers in collating the information and increase accuracy.

Some EPR are collected through Royalty Managers rather than automatically deducted by grain traders - a further complication for growers and increasing some of the confusion existing around the payment of EPR. We suggest that all Royalty Managers be required to provide additional information on EPR and their role in collection with any tax invoice they forward to growers on behalf of breeders.

It would be preferable to have all EPR deducted by grain traders and very clearly recorded on RCTI. Growers are not required to undertake lengthy recording of levies which are taken out by grain traders and it would be simpler if EPR were the same.



The use of the Ezigrain site to transfer grain from Viterra sites to buyers allows for the splitting of loads which can be sold to various buyers. Tracking these sales with changing delivery/contract/sale numbers to identify not only variety but also grain traders creates considerable workload for growers.

While we note that a new website has been established to hopefully make it easier for growers to find current EPR rates to use in their calculations we don't believe this is sufficient to reduce the time required for growers to complete the Declarations. It would be useful if future Declaration Forms included information of this website and where to go to for EPR rates for various varieties.

Another issue identified by members is that the Declaration Form is required by the end of April. In this era of active marketing by growers, and the use of on farm storage and warehousing facilities, grain is not necessarily sold by this date. And at this time of the year growers are either already sowing the crop or preparing to do so. A delay in the date would not only capture more of the sold grain but also get more attention once the busy sowing season is over. Of course this wouldn't be an issue if all grain traders collected and reported on the EPR.

We believe our members are supportive of the need for EPR, however a more efficient way of collection of the data would support all involved in the industry.

Kind regards

Mr Richard Murdoch  
Chair  
SA Advisory Board of Agriculture