



AUSTRALIAN  
FOOD AND GROCERY  
COUNCIL

# SUBMISSION

SUBMISSION TO

PRODUCTIVITY COMMISSION

IN RESPONSE TO

REVIEW OF AUSTRALIA'S CONSUMER POLICY  
FRAMEWORK DRAFT REPORT

6 February 2008

## PREFACE

The Australian Food and Grocery Council is the peak national organisation representing Australia's packaged food, drink and grocery products industry.

The membership of the AFGC comprises more than 150 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the highly processed food, beverage and grocery products sectors. (A list of members is included as Appendix A.) The AFGC represents the nation's largest manufacturing sector. By any measure Australia's food, drink and grocery products industry is a substantial contributor to the economic and social welfare of all Australians. Effectively, the products of AFGC's member companies reach every Australian household.

The industry has annual sales and service income in excess of \$70 billion and employs more than 200 000 people – almost one in five of the nation's manufacturing workforce. Of all Australians working in the industry, half are based in rural and regional Australia, and the processed food sector sources more than 90 per cent of its ingredients from Australian agriculture.

The AFGC's agenda for business growth centres on public and industry policy for a socioeconomic environment conducive to international competitiveness, investment, innovation, employment growth and profitability.

The AFGC's mandate in representing member companies is to ensure a cohesive and credible voice for the industry, to advance policies and manage issues relevant to the industry and to promote the industry and the virtues of its products, enabling member companies to grow their businesses.

The Council advocates business matters, public policy and consumer-related issues on behalf of a dynamic and rapidly changing industry operating in an increasing globalised economy. As global economic and trade developments continue to test the competitiveness of Australian industry, transnational businesses are under increasing pressure to justify Australia as a strategic location for corporate production, irrespective of whether they are Australian or foreign owned. In an increasingly globalised economy, the ability of companies to internationalise their operations is as significant as their ability to trade globally.

Increased trade, rationalisation and consolidation of businesses, increased concentration of ownership among both manufacturers and retailers, intensified competition and dynamic, increasingly complex and demanding consumers are features of the industry across the globe. Moreover, the growing global middle class of consumers is more sophisticated and discerning, driving innovation and differentiation of products and services.

The AFGC is working with governments in taking a proactive, even tactical, approach to public policy to enable businesses to tackle the threats and grasp the dual opportunities of globalisation and changing consumer demands.

## 1 INTRODUCTION

The Australian Food and Grocery Council (AFGC) welcomes the opportunity to make a submission to the Productivity Commission in response to the *Review of Australia's Consumer Policy Framework. Productivity Commission Draft Report* (“ the draft Report”).

The submission is presented in two parts:

- 1) general comments on the Draft Report; and
- 2) specific comments relating to food industry matters.

## 2 GENERAL COMMENTS ON THE DRAFT REPORT

The draft Report represents a substantial body of work which provides the rationale for developing a national approach to consumer policy, lists the key operational objectives upon which a consumer policy framework should be built and identifies practical issues (such as constitutional arrangements) which will constrain development of an all embracing national policy development, regulatory and enforcement system.

The AFGC is not in a position to comment on many issues in the draft Report as they are beyond the scope of the AFGC's policy interests lying in the financial services sector. The AFGC comments are restricted, therefore, to general policy issues and specific issues which directly or indirectly affect the food industry and its consumers.

### 2.1 A NATIONAL APPROACH

The AFGC concurs with the key findings of the draft Report which provides the rationale for a national approach, these being related to:

- 1) effectiveness and scope - closing the gaps which currently exist through the duplication, and lack of alignment of consumer policy in Commonwealth, and State and Territory jurisdictions; and
- 2) efficiency – again due to duplication of resources and misalignment between jurisdictions.

Indeed the current food regulatory system in Australia, which might be considered a subset of an overarching consumer policy (particularly when it comes to consumer protection), is a microcosm of similar issues. Consumers are protected by food laws which vary to more or lesser degrees going from State to State despite the fact that each jurisdiction is supposed to enact legislation which reflects the Model Food Act.

This results in uneven regulatory protection of Australian consumers (possibly resulting in some consumers in some jurisdictions being at potentially greater risk).

The AFGC considers therefore that Federalism, and the constitutional arrangements between the Commonwealth, States and Territories should not, of themselves, be the excuse for not seeking national, consistent and aligned approaches in all areas of policy and regulation. Regional variations may provide reasons for different policy and regulatory

focus, but such requirements will be relatively limited. In the majority of cases, and certainly in consumer protection, a national perspective and policy foundation is required.

## 2.2 KEY OPERATIONAL OBJECTIVES

The AFGC concurs with the key operational objectives described in the draft Report, but considers further operation objectives should be added. Thus the list of operation objectives<sup>i</sup> should be amended to indicate that the “*consumer policy framework should efficiently and effectively aim to*”:

- provide flexibility through a range of measures being available to address consumer protection issues;
- adopt evidence-based assessments of actual or perceived consumer disadvantage or detriment along with evidence-based approaches to addressing the issue, with clear identification of outcomes to be secured;
- apply minimalist approaches to rectifying actual or perceived consumer risks reflecting the maxim of minimal, effective policy and regulation to minimise community burden; and
- recognise inherent differences across the range of community and industry sectors which will require modification and moderation of measures of consumers protection to be used.

The AFGC notes that elsewhere in the draft Report these additional points are identified, but the AFGC considers they are of sufficient importance to be reflected in the operational objectives of a consumer policy.

### **Recommendation**

**The AFGC recommends that the operational objectives be expanded to include:**

- **flexibility of response measures;**
- **evidence based foundations for action;**
- **minimal imposition of policy or regulatory burden; and**
- **industry specific approaches where appropriate.**

## 2.3 SINGLE NATIONAL REGULATOR

The AFGC supports the proposal to establish a single national regulator to provide consumer protection. Consumer protection is a broad and complex area interfacing with many industries, community sectors, regulatory and legal systems. The AFGC recognises that there are generic issues which cross broad areas of consumer interest. It is appropriate for these issues to be dealt with centrally and nationally. Indeed, the consumer protection provisions of the Trade Practices Act and activities of the Australian Consumer and

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<sup>i</sup> Summary draft Report, p. 12

Competition Commission (ACCC) illustrate that some fundamental issues such as prevention of fraud and deception and anti-competitive behaviour can be provided for at a foundation level by national legislation enforced by a national agency. The AFGC considers, however, that further specific protection on a issue or sector basis can be provided for by further specific self, co- or full regulatory regimes. These may, and frequently do, require specialist regulatory regimes and specialist organisations managing them. The Productivity Commission has recognised this in the draft Report<sup>ii</sup> vis:

*“...generic laws (and competitive markets) will not always be sufficient to protect consumers  
.....industry specific approaches will sometimes be warranted.”*

Thus a regulatory framework with several tiers (with the number depending on the specific requirements of the sector) is appropriate for ensuring breadth of coverage particularly for generic issues, and depth where there are high levels of complexity and concomitant higher levels of consumer risk. In both cases there should be national uniformity of consumer protection outcomes, but delivery may be achieved through differing institutional arrangements, with the caveat that special attention and measures will be required to ensure consistency and coherence at the interfaces of regulatory systems.

#### **Recommendation**

**The AFGC recommends a tiered approach to national consumer protection with generic issues covering a number of sectors being provided for in a single regulatory framework, but more complex issues being addressed by dedicated regulatory frameworks and dedicated regulatory and enforcement institutions.**

### **3 SPECIFIC COMMENTS**

The AFGC has reviewed the draft report in the food industry context – that is, in considering the proposals in the draft Report, the AFGC has assessed firstly, whether consumer protection from the food industry and its products would be enhanced and secondly, whether the food industry itself would benefit if the proposals were adopted.

#### **3.1 INDUSTRY SPECIFIC REGULATIONS**

The primary objectives of Australia's food regulatory system are to protect consumers by ensuring food is safe and suitable and enough information is available for informed choice. Specifically food regulations cover:

- food production and processing – primary industry standards and the food safety standards mandate requirements to ensure food is safe and suitable for consumption;
- food composition – requirements for levels of ingredients, nutrients, additives and processing aids, allergens, endogenous toxins, contaminants and novel foods; and
- food labelling – information on food composition, origin and safe use.

The first two points and some aspects of the third require high degrees of specialist scientific knowledge as the regulations cover highly technical topics. Producing, processing

<sup>ii</sup> Summary draft Report, p.24

and distributing the large volumes of safe, wholesome and affordable food demanded by Australian consumers is technology intensive. Generic consumer protection regulations would be insufficient in providing the necessary safeguards to minimise harm to consumers. Only specific regulations addressing particular risks and seeking particular outcomes can provide high levels of protection, and minimise product failures which may have catastrophic consequences (namely food poisoning) for consumers. The draft Report<sup>iii</sup> has identified that industry specific regulation may be desirable when:

*“...the risk of consumer detriment is high .....and/or the technical nature of a product or service makes it easier for a regulator to assess breaches of appropriate behaviour against some objective standards.”*

The AFGC considers that specific food industry legislation is not only desirable, but essential.

Consumers themselves also recognise that some areas of legislation require competent, authoritative bodies to provide high levels of consumer protection. Indeed the existence of those bodies can provide confidence in the safety of products. An example is the Food and Drug Administration (FDA) in the USA which enjoys an enviable reputation amongst food regulatory agencies of being highly skilled and effective in assuring the safety of the food supply for Americans.

In Australia food standards are developed by Food Standards Australia New Zealand (FSANZ). The AFGC considers that ideally, Australian consumers would have similar levels of confidence in FSANZ as Americans have in the FDA. But such confidence can only come from a long history of operation, and FSANZ is relative new.

The AFGC considers, therefore, that consumer confidence in the safety of the food supply and the food regulatory systems is enhanced by having a well known, well resourced and competent food regulatory agency. The United Kingdom recognised this a few years ago and established the UK Food Standards Agency.

In Australia, enforcement of food standards is the responsibility of individual State and Territories, but enforcement varies between jurisdictions in Australia due to:

- differing institutional arrangements regarding the role of State & Territory departments and local government;
- differing government priorities on enforcement resulting in different levels of enforcement agency resource allocation and technical competencies between jurisdictions; and
- variations in regulations as the Model Food Act has been adopted to differing degrees by jurisdictions.

Unnecessary costs and competitive disadvantages are imposed upon food companies operating across State and Territory borders when there are:

- different food regulations – companies have to spend more time and resources determining the regulatory requirements of the markets they operate in, and may

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<sup>iii</sup> Summary draft Report, p25

have to adapt products or processes to ensure compliance with all regulations in all markets;

- different approaches to enforcement – lack of enforcement, particularly in areas where companies compete directly (such as in label claims) may lead to different interpretation of requirements and so different cost imposts on companies; and
- limited technical competencies – in areas of highly complex manufacturing processes the capability of analytical laboratories is compromised by the lack of proficiency in sampling and testing methodologies, particularly in jurisdictions with limited resources.

The AFGC considers the enforcement approach of food production and processing standards differs from food composition and food labelling standards.

#### *Food Production and Processing Standards*

Enforcement of food production and processing standards requires local inspection and audit of production systems and premises, and systematic sampling and testing of products for sale. These are resource intensive activities some of which can be carried by industry itself, through the use of independent, accredited third party audit. Minimising costs and reducing duplication of activities can be achieved where Government accepts third party audits. Audit frequency based on risk assessment and reduced frequencies for companies which perform well can further reduce costs for industry and allow government resources to be focused on areas of greatest public health risk. Government also has a role, particularly in product and systems surveillance and monitoring. This requires local offices and officers with local knowledge of the agricultural and food industries. Consequently, for optimal effectiveness, this area of standards enforcement is best carried out locally.

#### *Food composition and Food Labelling Standards*

Food composition and labelling requirements are applicable nationally – there are no unique regional requirements. Therefore, their provisions and enforcement should be uniform in all regions. Uniform enforcement is best achieved by a central food standards enforcement agency. Enforcement responsibilities would involve:

- product monitoring and surveillance of compliance with composition and labelling standards – some of this activity might be contracted out to other agencies to provide national coverage;
- oversight of industry codes of practice which might provide further regulation of the market in composition or labelling areas;
- coordination of enforcement policies and activities with other agencies such as the ACCC; and
- provision of formal compliance advice to industry generally, or individual companies, to support the intent of the food standards in the event of ambiguity in interpretation – this would be similar to the tax rulings provided by the Australian Tax Office.

Enforcement of food composition and labelling should therefore become a Commonwealth responsibility residing in a single Government department with primary responsibility for food standards implementation. The department would require substantial technical capability to be effective.

Food Standards Australia New Zealand (FSANZ) should not have its power extended to enforcement due to inherent conflicts of interest – its role should remain restricted to food standards development, review and amendment.

States, Territories and the Commonwealth need to agree that responsibility for some enforcement activity (food composition and labelling) should be ceded to the Commonwealth. This will require amendments to State and Territory food acts which provide for food regulation to adopt by reference provisions of the Food Standards Code. As a first step States and Territories should adopt the Model Food Act in its entirety (Parts A and B) and without amendment.

At the State and Territory level further steps can be taken towards consistency and streamlining of responsibility for enforcement between Departments and local government in the areas of primary production and food safety enforcement, and particularly if the major food producing and manufacturing States were to accept third party audits as an alternative to inspections.

The regulatory burden on the food industry and governments in Australia can be substantially reduced by reforming regulatory arrangements through centralizing some responsibilities for efficiency gains (e.g. composition and labelling) and maintaining decentralization of others (food production and safety) for effectiveness.

This will require coordination between the States and Territories and the Commonwealth to change legislation (Acts) which allocate enforcement responsibility to authorities.

The overall effect would be to allow States and Territories to concentrate on enforcement of food safety requirements at local level in their local industries, whilst the Commonwealth would focus on enforcement of food standards which apply equally to all business and protect all consumers equally across the nation.

The AFGC considers that the draft Report should be amended to address this issue in particular – namely having made the case for industry specific regulations, the description of circumstances where industry specific regulatory agencies are desirable requires expansion and specific examples.

### **Recommendation**

**The AFGC recommends the Productivity Commission consider the circumstances under which national industry specific regulatory agencies are appropriate to provide industry specific regulation complementing the role of a single national regulatory for more generic consumer protection issues.**

## **3.2 FOOD POLICY AND REGULATORY SYSTEM**

The draft Report notes<sup>iv</sup>

*.... lack of policy responsiveness to changing circumstances, due to the need to often secure agreement from nine jurisdictions ..... creates the potential for significant detriment for consumers....”*

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<sup>iv</sup> Summary draft Report, p.17



The food industry is subject to the vagaries of 10 jurisdictions due to the additional participation of New Zealand in the development of food standards and failure of all jurisdictions to adopt the Australia New Zealand Food Standards code without variation.

Thus Australia's system of food policy and standards development is cumbersome and hinders the adoption of innovations that benefit consumers and improve industry productivity due to:

- 10 governments and more than 20 departments involved in decision-making affecting food;
- inadequate resources being provided by the lead agencies (Health departments) at Commonwealth and State and Territory level and shortages of technical staff with key competencies ;
- lack of focus by FSANZ on core business – setting, reviewing and amending standards which protect consumers. Funding has increased and performance has decreased against key measures; and
- continuing failure of the States and Territories to adopt the Model Food Act into food law resulting and a lack of consistency and harmonisation in food regulations across the Australia.

The AFGC considers there is an urgent need to renegotiate the governance arrangements for food regulation in Australia to address serious flaws and establish processes and outcomes reflecting the Competition Policy Principles of minimum effective regulation adopted by the Council of Australian Governments (COAG).

Regulation should only be imposed to correct market failure (i.e. protect consumers) and in a manner sufficiently flexible to encourage innovation (which will benefit consumers). The AFGC seeks regulatory approaches that:

- protect consumers and provides choice through meaningful labelling and product differentiation in the market, and without misleading consumers;
- are practical for industry to implement, and authorities to enforce;
- are cost-effective, imposing minimal regulatory burden on the food industry, and minimal extra enforcement requirements on regulatory agencies; and
- are consistent with Australia's and New Zealand's international WTO obligations.

The AFGC strongly advocates a substantial reform of the food regulatory systems *viz*:

- new administrative arrangements and resources commensurate with the importance the food manufacturing sector and the contribution it makes to the economy across Australia;
- a national and consistent approach to enforcement – administrative arrangements might include some enforcement responsibilities being centralized, such as food composition and labelling. Enforcement of in other areas (i.e. food safety) might remain under local jurisdiction;

- responsive, efficient and evidence-based processes for the setting, review and amendment of food standards to provide for minimum effective regulation, supported by industry self or co-regulation where appropriate; and
- overall regulatory imposts restricted and proportionate to the need to protect consumers, provide meaningful information and create an environment conducive to business and trade.

The Productivity Commission has identified that

*“with the exception of product safety provisions, implementation of a one-regulator model for the proposed national generic consumer law would be problematic at this time.”*

The AFGC has already argued that for the food industry at least, national dedicated agencies for product safety are required – one for standard setting, one for enforcement. Reflecting the Productivity Commission's concerns, the AFGC has also identified some short comings of the current food regulatory system. It would be highly valuable if the Productivity Commission provided clear guidance on basic principles which should be applied when industry specific regulations are developed and the regulatory processes which agencies should adopt to assure their efficient and effective implementation.

The AFGC considers the principles for industry specific regulation might be along the following lines:

- the minimum necessary to protect public health and safety and inform the consumer;
- consistent across States and Territories – need for variations should be evidence-based;
- cooperatively developed with industry scientific experts to ensure their practicality and technical soundness to deliver desired outcomes; and
- uniformly enforced to minimise market distortions which may disadvantage individual food companies and some consumers.

Guiding principles for institutional arrangements might include:

- resources - appropriate attention by, and resources from, governments commensurate with size of the industry and potential benefits and detriments from policy and regulation;
- governance arrangements – reflecting and responsive to the respective interests of jurisdictions while maintaining strategic national perspectives;
- policy versus regulation – clear delineation between policy setting (by Ministerial Councils) and regulation setting by appropriate regulatory agencies, and enforcement by enforcement agencies;
- scope of regulations – clearly defined objectives and scope of regulatory frameworks (what's in and what's out);

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<sup>v</sup> Draft Report, p65

- operating principles – policy and regulatory interventions to be based on the principles of risk assessment, regulatory impact and proportionate response;
- legislative environment – the requirement for harmony at interfaces and intersections with other regulatory regimes;
- business environment – the factors which need to be given due consideration and policy and regulatory intervention; and
- jurisdictional relationships – clear understanding and agreement of where primary responsibility lies between the States and Territories and the Commonwealth, and in the case of food, the New Zealand government.

#### **Recommendation**

**The AFGC recommends that the Productivity Commission review provides clear guidance on basic principles which should be applied when industry specific regulations are developed and which should guide the policy and regulatory processes which agencies adopt to assure their efficient and effective implementation.**

### **3.3 INDUSTRY SELF REGULATION**

The AFGC considers that in some areas of consumer safety and protection self or co-regulatory codes of practices can be effective – particularly food labelling and the provision of product information – and form part of a ‘tiered response’ to product safety legislation. Specifically for food labelling and advertising the provision of information to protect the safety of consumers and provide other information might comprise:

- 1) general trades practice legislation prohibiting false and misleading information which may put consumers at risk;
- 2) industry self or co-regulation codes which provide industry with guidance on acceptable market behaviour in the nature and form of information to be provided to consumers on key issues relating to health and safety; and
- 3) full regulation on information which is critical to consumers to allow them to use products safely.

### **3.4 PRODUCT SAFETY LEGISLATION**

Nationally consistent product safety legislation can also be accommodated within a tiered system in a manner where legislation is complementary rather than hierarchical. Thus, using food as an example it is appropriate the industry specific legislation from an industry specific regulatory system protects the consumer from risk which is directly associated (and possibly uniquely associated) with food. Generic legislation can provide further protection.

If, for example, a consumer is injured through faulty packaging such as a from a glass container shattering on opening, then generic legislation may provide opportunities for the consumer to seek compensation. Indeed if it becomes clear that the class container was not

fit for purpose, prosecution by a national consumer safety protection agency may be appropriate.

## **4 CONCLUDING COMMENTS**

In this submission the AFGC has presented its position which can be summarised as supporting national approaches to consumer protection and product safety policy and regulation. A tiered approach which encompasses broad generic national arrangements and industry specific regulatory arrangements (regulations, self and co-regulations) providing national consistency is required to meet the dual equity imperatives of imposing minimal imposts on industry and equivalent protection and benefits to all Australians, irrespective of where they live.

The AFGC stands ready to provide further information on the positions it has expressed in this submission if required.

**APPENDIX A: AFGC MEMBERS AS AT 1 FEBRUARY 2008**

AAB Holdings Pty Ltd	Kellogg (Australia) Pty Ltd	Tate & Lyle ANZ
Arnott's Biscuits Ltd	Day Dawn Pty Ltd	Tetley Australia Pty Ltd
Snack Foods Ltd	Kikkoman	The Smith's Snackfood Co.
The Kettle Chip Company Pty Ltd	Kimberly-Clark Australia Pty Ltd	Unilever Australasia
Asia-Pacific Blending Corporation Pty Ltd	Kerry Ingredients Australia Pty Ltd	Waters Trading Pty Ltd
Barilla Australia Pty Ltd	Kraft Foods Asia Pacific	Wyeth Australia Pty Ltd
Beak & Johnston Pty Ltd	Lion Nathan Limited	Yakult Australia Pty Ltd
BOC Gases Australia Ltd	Madura Tea Estates	
Bronte Industries Pty Ltd	Manildra Harwood Sugars	
Bulla Dairy Foods	Mars Australia	
Bundaberg Brewed Drinks Pty Ltd	Mars Food	
Bundaberg Sugar Ltd	Mars Petcare	
Cadbury Schweppes Asia Pacific	Mars Snackfood	
Campbell's Soup Australia	McCain Foods (Aust) Pty Ltd	
Cantarella Bros Pty Ltd	McCormick Foods Australia Pty Ltd	
Cerebos (Australia) Ltd	Merino Pty Ltd	
Christie Tea Pty Ltd	Merisant Manufacturing Aust. Pty Ltd	
Clorox Australia Pty Ltd	National Foods Ltd	
Coca-Cola Amatil (Aust) Ltd	Nerada Tea Pty Ltd	
SPC Ardmona Operations Ltd	Nestlé Australia Ltd	
Colgate-Palmolive Pty Ltd	Nestlé Foods & Beverages	
Coopers Brewery Ltd	Nestlé Confectionery	
Dairy Farmers Group	Nestlé Ice Cream	
Danisco Australia Pty Ltd	Nestlé Chilled Dairy	
Devro Pty Ltd	Nestlé Nutrition	
Dole Australia	Foodservice & Industrial Division	
DSM Food Specialties Australia Pty Ltd	Novartis Consumer Health	
DSM Nutritional Products	Australasia Pty Ltd	
Ferrero Australia Pty Ltd	Nutricia Australia Pty Ltd	
Fibrisol Services Australia Pty Ltd	Ocean Spray International, Inc	
Fonterra Brands (Australia) Pty Ltd	Parmalat Australia Ltd	
Foster's Group Limited	Patties Foods Pty Ltd	
Frucor Beverages (Australia)	Peanut Company of Aust Ltd	
General Mills Australia Pty Ltd	Procter & Gamble Australia Pty Ltd	
George Weston Foods Ltd	Gillette Australia	
AB Food and Beverages Australia	PZ Cussons Australia Pty Ltd	
AB Mauri	Quality Ingredients Ltd	
Cereform/Serrol	Prima Herbs and Spices	
GWF Baking Division	Reckitt Benckiser (Aust) Pty Ltd	
GWF Meat & Dairy Division	Ridley Corporation Ltd	
George Weston Technologies	Cheetham Salt Limited	
Jasol	Sanitarium Health Food Company	
Weston Cereal Industries	Sara Lee Australia	
GlaxoSmithKline Consumer Healthcare	Sara Lee Foodservice	
Golden Circle Ltd	Sara Lee Food and Beverage	
Goodman Fielder Limited	SCA Hygiene Australasia	
Meadow Lea Australia	Schwarzkopf and Henkel	
Quality Bakers Aust P/L	Sensient Technologies	
H J Heinz Company Australia Ltd	Simplot Australia Pty Ltd	
Hans Continental Smallgoods Pty Ltd	Specialty Cereals Pty Ltd	
Harvest FreshCuts Pty Ltd	Spicemasters of Australia Pty Ltd	
Hoyt Food Manufacturing Industries Pty Ltd	Stuart Alexander & Co Pty Limited	
J Boag and Son Brewing Ltd	Sugar Australia Pty Ltd	
Johnson & Johnson Pacific Pty Ltd	SunRice	
Pfizer Consumer Health	Swift Australia Pty Ltd	
	Symrise Pty Ltd	

**Associate members**

Accenture  
Australia Pork Limited  
ACI Operations Pty Ltd  
Ampcor Fibre Packaging  
CHEP Asia-Pacific  
Concurrent Activities  
Dairy Australia  
Exel (Aust) Logistics P/L  
Focus Information Logistics Pty Ltd  
Food Liaison Pty Ltd  
Food Science Australia  
Foodbank Australia Limited  
IBM Business Cons Svcs  
innovations & solutions  
KPMG  
Lawson Software  
Legal Finesse  
Linfox Australia Pty Ltd  
Meat and Livestock Australia Ltd  
Monsanto Australia Ltd  
PricewaterhouseCoopers  
Promax Applications Group Pty Ltd  
Sue Akeroyd & Associates  
Swire Cold Storage  
Swisslog Australia Pty Limited  
Touchstone Cons. Aust Pty Ltd  
Visy Pak  
Wiley & Co Pty Ltd

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