



25 July 2008

Regulatory Burdens – Manufacturing & Distributive Trades
Productivity Commission
GPO Box 1428
Canberra City, ACT 2601

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Dear Presiding Commissioner

RE: ANNUAL REVIEW OF REGULATORY BURDENS – MANUFACTURING & DISTRIBUTIVE TRADES

Coles welcomes the opportunity to comment on the Productivity Commission's Draft Research Report on its *Annual Review of Regulatory Burdens – Manufacturing & Distributive Trades*.

Coles is a national supermarket retailer with over 750 stores operating across all states and territories of Australia. Whilst Coles does not manufacture food, Coles and its suppliers are significantly impacted by food regulation.

Please find below our comments on the food regulation draft responses 3.1 - 3.5 for your consideration.

Draft response 3.1

Coles submitted a detailed paper on the Bethwaite Review of Food Regulation in February 2007 and is extremely disappointed that 18 months have past since the Review and the Australian Government has still not publicly released any information to industry about what food regulatory reforms will be implemented.

Coles therefore strongly supports this draft response because it is important that the Australian Government keep retailers and manufacturers informed about what food regulatory reforms it intends to implement (and their timing) so that informed business decisions can be made.

Coles would be happy to participate in a further limited review should the Productivity Commission determine the need for such a review.

Draft response 3.2

Coles welcomes an independent review of the standards process in two years time. This is necessary in order to assess the effectiveness of the changes that were made in 2007 to the FSANZ development and amendment process.

Draft response 3.3

Coles believes the Food Ministerial Council should be required to publish a justification before it initiates a review of the Food Standards Code. This would ensure greater transparency in policy making for government and food businesses.

Draft response 3.4

Coles supports the inclusion of guidelines for the development of regulation in the Food Regulation Agreement because we believe this would help improve consistency and transparency of decision-making.

Coles also supports the requirement that the Food Ministerial Council publish a regular report of its actions in relation to regulation and how these actions reflect the COAG guidelines because we believe this will help improve adherence to agreed practice.

Draft response 3.5

Coles supports any move by the Australian Government to develop a more coordinated approach between the Australian Health Ministers Conference and the Australia New Zealand Food Ministerial Council.

Coles also agrees that national health policy issues should be first dealt with by Health Ministers and that any subsequent policy matters relating to food should be referred to the Australia New Zealand Food Regulation Ministerial Council.

Conclusion

Coles fully supports a nationally consistent approach to food regulation to reduce the regulatory compliance burden on food businesses and would welcome the opportunity to work with the Australian Government to achieve this within agreed timeframes.

Thank you again for the opportunity to comment.

Yours sincerely

Jodi Dixon
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Coles Group.