Confectionery Manufacturers of Australasia Limited

22 April 2008

Regulatory Burdens: manufacturing, wholesale and retail
Productivity Commission
GPO Box 1428
Canberra City ACT 2601
By email: regulatoryburdens@pc.gov.au

Dear Sir/Madam

Productivity Commission Issue Paper (February 2008) Annual Review of Regulatory Burdens on Business – *Manufacturing & Distributive Trades*

About the CMA

The Confectionery Manufacturers of Australasia Limited (CMA) is the peak industry body representing the confectionery industry in Australia and New Zealand. The CMA's principal mission is to enhance the well-being and develop interests of the confectionery industry in Australasia. It promotes the interests of manufacturers as well as suppliers and distributors of confectionery. This response is submitted on behalf of our 200 members (refer Appendix 1).

General Comments on the Issue Paper

The CMA welcomes the opportunity to comment on the Productivity Commission's Annual Review of Regulatory Burdens on Business – *Manufacturing & Distributive Trades*. It is extremely important that the burdens on business are minimised to ensure competitiveness in trade both locally and in international markets. The operating environment is in a state of change, from the regulatory and non-regulatory perspective. Consumer needs and wants are changing the way manufacturers do business and consolidation and pressure in the retail sector also impacting on business. More than ever before, the food industry needs to be more focussed on its competitiveness and the operating environment needs to be conducive for such activity. Australian producers need the capability to innovate and be able to bring these innovations to the marketplace expeditiously in order to retain their competitive advantage. This means the food industry needs an environment that is supportive of innovation with processes that do not impede the food industry's ability to remain competitive. The flexibility in the food regulatory system has a contribution to make to assist the competitiveness of the food industry.

Specific Comments on the Issue Paper

This section that follows attempts to identify a range of regulatory burdens impacting the confectionery industry:

FSANZ P293 – Nutrition, Health and Related Claims

The Food Standards Australia New Zealand (FSANZ) review of nutrition, health and related claims is a classic example of a lengthy regulatory review process. This review commenced in 1995 with an issue paper and has progressed for over more than a decade. There have been many reincarnations of the review. In April 2008 the Final Assessment Report has been put to the Ministerial Council, following many delays. How long it takes from here remains unknown.

In terms of the health claims review, the CMA has objected to the potential prohibition of claims in connection with confectionery. The proposed disqualifying criteria with respect to sugars and saturated fats are likely to make it exceedingly difficult for the confectionery industry to claim health benefits, despite freedoms afforded in other industrialised markets and the scientific substantiation of such claims.

The CMA notes that authorities need to be forward thinking and progressive while maintaining consumer safety and confidence in the food supply.

The CMA has advocated that all foods should be permitted to carry health claims provided they are accurate and may be scientifically substantiated. The CMA is of the view that regulators are imposing good / bad ideological

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boundaries around individual confectionery foods, whereas the national nutrition recommendations refer to the health of the overall diet. Confectionery as a treat food in the diet, albeit small, has an acknowledged and legitimate place and contribution to a balanced diet and therefore health claims should also be permitted for these treat foods.

Public health policy encourages the food industry, including the confectionery industry, to develop and offer healthier food alternatives. Prohibiting most health claims, by limiting the scope of the regulation, does not demonstrate support of the food industry that already offers a wide range of nutritious and safe to eat food choices, eg benefits of calcium in milk chocolate, antioxidant content for general body health and phytosterols associated with lowering cholesterol.

As noted above the increased flexibilities afforded in other regional marketplaces concerns the CMA with respect to the local industry's ability to be progressive. Regulation is inhibiting the food industry's ability to move forward in line with consumer expectations. *CocoaVia* for example was launched in the US over 12 months ago. This product relies on ingredient and labelling permission not currently available in Australasia.

The CMA recommends that the proposed disqualifying criteria with respect to sugars, saturated fats and sodium be removed and that health claims be permitted on all foods for which a substantiated health claim may be justified.

FSANZ P293 – Nutrition, Health and Related Claims, specifically Sugarfree

A further key concern of the CMA's with respect to P293 is the treatment of *sugarfree* nutrient content claims. These have been permitted in the marketplace for more than a decade by food and fair trading regulators and consumer groups. The confectionery and wider food industry has invested in product development and promotional programmes throughout this period and built a category that has resonance with consumers. Under P293 regulators are proposing that *sugarfree* claims be permitted via fair trading provisions, rather than being prescribed in food law. This approach is inconsistent with FSANZ's precedent to regulate food provisions in food law, eg recently country of origin which is not deemed to be a health and safety concern to consumers was reviewed and remains regulated in food law rather than by trade practices and other nutrient content claims ie *low sugar(s)* remain under food law provisions. Consistency in the regulatory approach is required.

Currently *sugarfree* in Australia and New Zealand *means no more than 0.2g sugar(s) per 100g food.* This represents nutritionally insignificant traces of sugar(s). Omission of the *sugarfree* terminology from food law is also inconsistent with international food law practice, where the US, European Union and Codex allow foods containing nutritionally insignificant amounts of sugar(s) to be labelled as *sugarfree* with up to 0.5% sugar(s). This practical view recognises the limitations of technology, while at the same time keeps a reasonable perspective on what is physiologically insignificant.

The concern is that left to fair trading provision to regulate *sugarfree* the current practice allowing minor and unavoidable traces of sugar(s), ie 0.2% will move to a zero tolerance under governance of the Australian Competition and Consumer Commission (ACCC). This is likely to transpose as "no detectable sugar(s)" thereby providing an uncertain situation for industry, consumers and government enforcement agents as technological advances continue to improve and analytical methods are able to detect lower and lower thresholds of sugar(s).

In the case of confectionery, *sugarfree* is not based on addition of sugar(s), rather the elimination of sugar(s) and substitution with sugar replacers (eg isomalt, maltitol, sorbitol) and intense sweeteners (eg aspartame, saccharin). The 0.2% tolerance, currently in existence in Australia and New Zealand, is designed to accommodate trace levels caused as a bi-product of manufacture/carryover. This is unavoidable and the quantity present in confectionery is less than 0.2% (in accordance with the provisions of the Australian Code of Practice on Nutrient Content Claims (CoPoNC)), which represents a physiologically, clinically and nutritionally insignificant quantity and, for all intent and purpose, this does no constitute false, misleading or deceptive conduct, and so is not contrary to the objectives of food standards.

The Australian *sugarfree* confectionery market is currently worth in excess of A$220 million of which A$160 million derives from chewing gum sales in Australia. In addition to end product developmental costs, marketers have invested considerable resources to develop brand acceptance for intense sweeteners eg Splenda, Sunett and

NutraSweet that are used in conjunction with *sugarfree* products. Similarly sugar alcohols/polyols have been developed for the *sugarfree* market eg isomalt, maltitol, sorbitol. Xylitol and others.

Research conducted in 2003 by the CMA indicates that consumers continue to be interested in *sugarfree* confectionery, particularly from a dental perspective, and the industry supports the use of simple, accurate messages such as *sugarfree* to convey the information to consumers. It is important that consumers can ascertain nutrition and health information in a quick and easy manner that can be conveyed by a simplistic, concise, accurate communication that may be easily understood. In the case of *sugarfree,* for all intents and purposes, the sugars have been removed, substituted with polyols, or are not present.

Although the ACCC advised the CMA on 24 April 2003 that *"it remains concerned about the use of the 'sugarfree' descriptor on products that contain a residual sugar component … it does not propose to take enforcement action against the use of the descriptor where the level of sugar in products is nutritionally insignificant. Nevertheless, the ACCC indicates that it reserves the right to take future action, particularly if it receives consumer complaints or the use of claims appear to be giving a trader an unfair advantage over its competitors".* With respect to confectionery, these claims have not raised consumer confusion or a single complaint over the decade of CoPoNC's operation, and remain as valid now as they did in 1995.

In fact by omitting food regulation for *sugarfree* places the unfair competitive advantage on domestic producers that currently comply with a maximum 0.2% sugar(s) criteria and likely to represent 'no detectable' if regulated by the ACCC. Imports generally comply with the more flexible Codex provision (0.5% sugar(s)) and are likely to go unchecked by import enforcement officers, given the poor track record of the enforcement agencies.

Through its non-alignment with Codex, Australia and New Zealand will also be out of step with other international markets, causing trade barriers for local importers and disadvantaging consumer choice.

Whilst P293 does not advocate a prohibition for *sugarfree* claims, however, by omission, leaves the issue for trade practices to arbitrarily enforce compliance which is inadequate.

The CMA recommends that a qualified *sugarfree* claim ie 0.2g per 100g of food is enshrined in the proposed new Food Standard 1.2.7 to provide certainly and protection for consumers, consistency of application by industry, greater consistency between domestic and international food law, promotion of an efficient and internationally competitive food industry, fair trade in food and a framework for compliance and enforcement for designated agencies. At the time of writing, the P293 Final Assessment Report has been referred to the Ministerial Council for approval.

FSANZ P272 – Labelling requirements for food for catering purposes and retail sale, including pick 'n' mix confectionery

The CMA has expressed concern to FSANZ with respect to labelling requirements for pick 'n' mix confectionery items and other similarly configured and distributed *very* small packages of food.

The CMA considers the issue of labelling packaged (wrapped) pick 'n' mix items as one of the number of issues that has emerged following the implementation of the new Code, which was not foreseen during the development of the Standard and consequently provisions for these, typically bite size, confectionery units were not captured in the new Code.

Packaged pick 'n' mix confectionery and similar small packaged items (including non-confectionery) are generally very small, loose individual items which may include in the case of confectionery, but not limited to: novelty shaped confectionery, foil or twist wrapped, flow wrapped in pillow pack configurations and any one-bite confectionery pieces, sold out of display or self-serve dispensing units and distributed via a range of outlets including: airlines - to accompany in flight meals, hotels for guests enjoyment in room as 'hotel turn downs', accompanying a coffee at a restaurant, for conference tables, hotel reception desks or restaurants, in showbags, for re-packing as well as the commonly understood pick 'n' mix arrangements as noted above.

FSANZ has recommended that these very small items be treated as per a *small package* (as defined by the Code - 100cm^2 surface area or less) and as such labelling with the following:

- the name of the food;

- lot mark (where applicable, ie not sold from a display outer which contains this information)
- the name and business address details of the supplier;
- directions for use or storage (where applicable)
- mandatory warning and advisory statements and declarations, including allergen ingredients; and
- in Australia, the country of origin.

Pick 'n' mix confectionery formats have very limited surface area on which to print and it would not be possible, in most cases, to physically fit all the information that is required on a *very small package* whilst remaining compliant with the legibility and prominence provisions of the Code.

This proposed approach demonstrates a lack of awareness on the part of FSANZ as it fails to recognise the limitations and practicalities of the situation.

The CMA believes that applying the current labelling requirements for *small packages*, to packaged pick 'n' mix confectionery, is overly onerous and has recommended that an exemption be established and a general term developed to describe the alternate *very* small units.

Ideally, the CMA recommends that packaged pick 'n' mix confectionery with a surface area of less than or equal to 50cm^2 should be treated in the same manner as their unwrapped counterpart, thus requiring no labelling information. As such, consumers will remain adequately informed as this information must be available to be provided to the consumer on request, as is required for unwrapped items. Regardless, labelling is not an effective regulatory measure, as pick 'n' mix confectionery tends to be impulse purchases, it is consumed near the point of purchase and the wrappers are disposed of within a short distance of the purchase point.

For the confectionery industry to do as proposed will be prohibitively expensive. P272 has reached Final Assessment Report and a second review is currently underway at the request of the Ministerial Council (the second review does not relate to small packages).

One-off costs will be introduced for new capital investment in addition to the ongoing cost of pre-printed packaging and loss of efficiency and this does not take account of the logistic difficulties.

The return on investment for businesses would not be economic and companies, both multi-nationals and small to medium size (SME) family operated enterprises would literally have to walk away from this form of business. To adopt FSANZ's recommended approach would see the demise of a category and worse the collapse of many SME businesses, already under great pressure. For this reason the CMA has an Application underway to FSANZ to seek an amendment to the Code.

Pick 'n' mix is worth from four percent to eighty or ninety percent of business for some confectionery businesses in Australia. Some companies have more than 30 lines that would be impacted and in some situations this business may be conducted over several manufacturing plants. One company has eight lines that would be affected, another four, and new equipment would need to be purchased and incorporated (if achievable) in order to meet the proposed FSANZ requirements.

The affected products range in size from 10-50cm^2 in surface area and weigh between 5-15g. In order to comply, companies will need to re-originate packaging, incur capital investment for new technology and there would also be ongoing costs associated with the loss of production efficiency.

The re-origination of new labelling is estimated to cost from $4000 per item and amount to a sum of $150,000 to $200,000 for some companies. There would be on-going additional printing costs annually which may amount to $5000 per item and in order to meet continuity of supply manufacturers will need to hold more expensive, individually printed wrapping material to manage lead times.

In terms of capital costs, this may be in the vicinity of $40,000 to $1,250,000 per line, depending whether equipment modification or new equipment is required to be installed. The on-going costs connected with loss of efficiency are estimated to result in a twenty percent loss of efficiency and this is further estimated for one company to be a minimum of $800,000 per annum.

The requirement to lot code, in particular, on very small packages (pick 'n' mix confectionery), or provide other measures of traceability identification, is of great concern to the confectionery industry. To achieve the legal requirements of legibility and prominence of information about a quarter of the very small packages (depending on size) would need to be dedicated to print the lot identification, without regard for the name of the food, name and address of the supplier, allergen ingredients/mandatory declarations and, in Australia, country of origin labelling – mandatory requirements currently specified for *small packages* (as defined). Lot marking is done in line, at high speed and would require incredible technology to stamp the identifier whilst operating at 1200 units per minute, for example. Alternatively, off-line printing of twist wrappers with lot coding and/or pre-printed stickers with the labelling provisions required on *small packages* would be prohibitively expensive.

This potential penalisation of the food industry, including confectionery industry, also comes at a time when government is encouraging smaller portion packs to assist consumers with consumption and healthier lifestyles.

The practice, in the majority, not to label in accordance with the requirements of a *small package* has been the industry's approach well before the new Code came into operation in 2000 (sole operation by December 2002) and to date the CMA is not aware of any problems arising.

Unwrapped pick 'n' mix product does not attract scrutiny, so nor should the wrapped counterpart. Commonsense must prevail in due course, and the CMA looks forward to favourable consideration to its Application when submitted.

FSANZ A552 – Cadmium in peanuts

In November 2004, the CMA made an application to FSANZ to review the maximum level of cadmium in peanuts in the Code. This application was lodged as an unpaid application and was placed on the FSANZ Work Plan. A552 was subsequently released for Initial Assessment in October 2006 (the CMA notes two years later).

In particular, the CMA sought to amend Standard 1.4.1 – Contaminants and Natural Toxicants to harmonise with Codex and remove the ML for cadmium in peanuts. This option was based on:

- achieving international regulatory alignment,
- removal of trade barriers that might unnecessarily interrupt manufacturers' supply chains; and
- provision for Australian and New Zealand food industry to access peanuts from a wider range of countries, similar to their international competitors,
- without compromising consumer health and safety.

The CMA application has subsequently been amended (February 2008) at the request of FSANZ to specify a maximum level (ML). The ML sought is 0.5mg/kg.

Australia is a small producer of peanuts compared to other producing countries, eg China, India, Africa, USA, Senegal, Argentina and it is clear that Australian supply does not consistently meet demand requirements and reliance on import arrangements is already a necessary fact.

Peanut varieties are selected for incorporation into confectionery based on a range of variables and due to the unpredictability of supply, hampered by Australian's climatic and growing conditions, some greater flexibility in the current ML (0.1mg/kg currently) for peanuts is required to improve reliability for importation.

Based on the:

- global variability in cadmium levels evidenced,
- need for flexibility to respond to the drought and volatility in weather conditions, and
- need to look to at broader origins for continuity of supply

the CMA has recommended that a new ML of 0.5mg/kg would provide reasonable flexibility and a greater level of confidence of supply, without unnecessarily restricting import sourcing arrangements, while minimizing the threat of supply sustainability, whereas raising the ML to just 0.2mg/kg retains a higher level of

operational risk. Such increased flexibility would alleviate supply chain pressures now and into the future and enable importers of peanuts confidence to do business in Australia, without the regulatory burden which is not evidenced elsewhere.

A higher cadmium ML that does not compromise public health and safety would allow trade to be conducted without unnecessary interference.

Food-Type Dietary Supplements

In June 2002, FSANZ (formerly ANZFA) released P235 – Review of food-type dietary supplements. This was then followed by a policy review requested by the Ministerial Council in May 2003. In addition, the New Zealand Dietary Supplements Regulations 1985 have been under review for some time. In 2004, a discussion document was first released proposing the regulatory separation of food-type and therapeutic-type dietary supplements. The New Zealand Food Safety Authority (NZFSA) in February 2007 has now released a further discussion paper.

On each occasion the CMA has recommended harmonisation between Australia and New Zealand for the purpose of achieving a level playing field. Currently food-type dietary supplements may be made within the food law in New Zealand, however in Australia these products would fall within the jurisdiction of the Therapeutic Goods Administration.

Whilst harmonisation of this area of regulation remains outstanding, this demonstrates the convoluted process involved and the extensive timelines evident by way of regulatory and policy review, meanwhile New Zealand food producers operate with an advantage over their Australian counterparts as New Zealand dietary supplements are permitted to be sold in Australia, whereas Australian producers are not permitted to do the same.

A further loop-hole exists as product may enter New Zealand and by way of the Trans Tasman Mutual Recognition Arrangements (TTMRA) product may legally be re-exported to Australia.

Food policy

From the above example, it is evident that delays in policy development hold up progress in the development of FSANZ Proposals and Applications. Other similar examples include P236 – Sports Foods and P260 – Use of non culinary herbs in foods where progress is pending other policy and/or regulatory outcomes.

Australia New Zealand Food Standards Code

As a final remark on the Australia New Zealand Food Standards Code, the CMA is concerned about the ease with which New Zealand seems to be able to opt out of requirements, for example the food safety standards, agricultural and veterinary chemicals and the latest country of origin provisions. Whilst the CMA acknowledges that there is no consumer health and safety risk associated with country of origin labelling, the opting out by New Zealand fragments what is otherwise intended to be a uniform Australia New Zealand approach to food laws. Particularly as many companies operate in both markets uniformity is desirable and is the regulatory rationale. Lack of uniformity results in greater inefficiency and hampers Australian producers ability to compete internationally. Whilst this is not strictly in the scope of this review the impact is non the less relevant for Australian transactions.

Uniform enforcement and interpretation

The CMA has for many years expressed a lack of confidence with regard to enforcement practices. Key to consistent enforcement is uniform interpretation and implementation and consistent enforcement is directly related to the successful and consistent education across all platforms.

The CMA can cite many examples where the uniform interpretation of regulations has been inadequate, making it difficult for companies to do business intra and interstate as companies are denied the option whilst their competitors are given the go ahead.

For example the Victorian Food Branch of the Department of Human Services provided Company A with an interpretation on a functional health claim. This differed from the interpretation offered to Company A in another jurisdiction, namely New South Wales.

Another company received an interpretation from a food enforcement officer in Victoria (the state of manufacture), however the company fell foul to the interpretation provided by their New Zealand counterparts where the product was also being sold.

In another case a company questioned the compliance of a food label which was clearly in breach of the FSANZ requirements and was advised by an officer from the South Australian Food Section in the Department of Health that the label complies with South Australian guidelines. Although the officer acknowledged that the label should have the physical street address instead of postal address, the Department was not prepared to enforce the regulatory provision. Instead the officer gave the company the telephone number of the company responsible for the product concerned so the matter could be taken up directly with them.

These are just three examples, however there would be many more.

The CMA also observes a distinct lack of compliance on imported confectionery products in the marketplace. This must be the same across the food sector. Product breaches fail to be detected at the border entry by the Australian Quarantine Inspection Service (AQIS) and equally remain in the marketplace, owing to the limited enforcement resources committed to local enforcement activities. Invariably failure to comply with the local regulatory requirements means that importers are afforded a competitive advantage against their law abiding local competition.

As a result, the CMA has for many years operated its own self-regulatory approach to non-compliant labelling. Whilst the CMA is not an enforcement authority it conducts surveillance of the marketplace and attempts to alert offenders of breaches of the law and seeks remedial action. Where the CMA receives an unsatisfactory response, such matters are then referred on to the appropriate authorities to intervene. However, limited resource are allocate to this type of government work, with a focus being directed to health and safety. Whilst this priority is understood by the CMA, equally non-health and safety related labelling breaches in the marketplace are disadvantaging the law abiding producer as they incur costs in meeting the regulatory requirements when the competitor has not. This self regulatory initiative of the CMA's is applied to domestic producers as it is to importers.

Average Quantity System (AQS)

Whilst the Queensland Consumer Affairs jurisdiction provides the lead regulatory development on this average quantity system for the measurement of pre-packed articles, the CMA is frustrated by the lengthy discussions aimed at developing an Australian AQS system. In 1999, the Ministerial Council on Consumer Affairs (MCCA) agreed it would be appropriate to amend the uniform trade measurement legislation to adopt AQS and requested that Queensland proceed with drafting the recommended amendments to the Queensland *Trade Measurement Act 1990*. In the interests of uniformity, these amendments would be used as the model by the other participating states and territories to amend their own legislation.

Whilst AQS has been debated in Australia for more than eight years, AQS has been legal in New Zealand for six years and a large number of Australia's trading partners have also adopted AQS, including: the European Union, Switzerland, USA, Canada, Mexico, India, Japan and others.

Under AQS rules, Australian manufacturers would see a significant reduction in overfill product and subsequently cost savings. As New Zealand manufacturers currently operate to an AQS system, they are advantaged as they can pack to a lower fill weight. These products are able to compete legally in the Australian marketplace due to the Trans Tasman Mutual Recognition Agreement (TTMRA) disadvantaging Australian competitors. In addition Australian suppliers are not going to produce to the New Zealand AQS provisions for export to New Zealand due to loss of economies of scale and efficiency as the approach is not acceptable in Australia.

After much discussion, it seems an Australian AQS system will be in place within the National Trade Measurement System by July 2010, regardless though this is evidence of an unnecessarily long and bureaucratic review process.

Summary

Again, the CMA reiterates its appreciation to comment to the Australian Government Productivity Commission regulatory review on business and should there be further queries, the CMA would be pleased to provide further input and/or assistance.

Yours sincerely

Jennifer Thompson
Technical & Regulatory Affairs Director

Appendix 1 – CMA Membership

Manufacturers

Australian

Allsep's Pty Ltd
Angelica Enterprises Pty Ltd
Arnott's Industrial
Aussie Sweets Pty Ltd
Australian Native Nuts & Chocolates Pty Ltd
Bellis Fruit Bars
Betta Foods Australia Pty Ltd
Buderim Ginger Limited
Cadbury Schweppes
Chocolate Fare Pty Ltd
Chocolate Gems
Chocolatier (Australia) Pty Limited
Colonial Confectionery
Corvina Quality Foods Pty Ltd
Crest Chocolates
Darrell Lea Chocolate Shops Pty Ltd
Denmead Holdings Pty Ltd
DMC Confectionery
Dollar Sweets Company Pty Ltd
Ernest Hillier Pty Ltd
Eszencia International Pty Ltd
Farm By Nature Pty Ltd
Ferrero Australasia Manufacturing Pty Ltd
Flying Swan Manufacturing
Fresh Food Industries Pty Ltd
Fyna Foods Australia Pty Ltd
GKC Foods Pty Ltd
Go Natural Australia
Golden Boronia (Australia) Pty Ltd
Gran's Fudge Pty Ltd
Haigh's Manufacturing Pty Ltd
Horizon Science Pty Ltd
Johnsons Confectionery Pty Ltd
Kellys Candy Co Pty Ltd
Kinnerton Confectionery Australia Pty Ltd
Lagoon Confectioners Pty Ltd
Lewins Pty Ltd
Lindt & Sprungli (Australia) Pty Ltd
Manna Confectionery Pty Ltd
Mars Snackfood Australia
Nestlé Confectionery & Snacks
Nina's Chocolates Pty Ltd
Nutters Australia Pty Ltd
Paton's Macadamias Plantations
Pink Lady Chocolates
Praline Chocolates
Quinzi's Confectionery
Ricci Remond Chocolate Co Pty Ltd
Robern Menz (Mfg) Pty Ltd
RTD Confectionery Pty Ltd
Smyth's Confectionery
Snow Confectionery Pty Ltd
Suga & Koko Black
Superpop Pty Ltd
Sweet William Pty Ltd
The Nut Shop Pty Ltd

The Wrigley Company Pty Ltd
Vitality Brands Worldwide Pty Ltd
Wawi Chocolate (Aust) Pty Ltd

New Zealand

Cadbury Confectionery Limited
Carousel Confectionery Ltd
Cookie Time Limited
Devonport Chocolates
Donovan's Chocolates
Innovex Group Ltd
J H Whittaker & Sons Ltd
Mars New Zealand Ltd
Mayceys Confectionery Ltd
Nestlé New Zealand Limited
NZ Food Group (1992) Ltd
RJ's Licorice Limited
The Wrigley Co (NZ) Ltd
Waikato Valley Chocolates Ltd
Waldrons Confectionery

Distributors

Australian

Accredited Distributors Pty Ltd
Allbrand Confectionery Distributors Pty Ltd
Aussie Fare Confectionery
Australian Confectionery Pty Ltd
Candy Brokers
Candy Creations Australia Pty Ltd
Confectionery Link Pty Ltd
Evans Confectionery Pty Ltd
Funtastic Confectionery
GAF Foods (Aust.) Pty Ltd
James Dickson & Co Pty Ltd
Lenahans Pty Ltd
Logo-Line Australia Pty Ltd
Lolliland Pty Ltd
National Confectionery Wholesalers Ltd
Stuart Alexander & Co Pty Ltd
SweetOz Distributions Pty Ltd
The Distributors
The Sugarless Company

New Zealand

Brandlines Limited
Confectionery House NZ Ltd
Crossmark New Zealand Limited
Gilmours

Suppliers

Australian

AarhusKarlshamn Australia Pty Ltd
ADM Australia Pty Ltd
AFIS Pty Ltd
Agency Contracting Services Pty Ltd

Allied Industries Pty Ltd
Aperio Group Pty Limited
APS Food & Nutrition
Asia Pacific Blending Corporation
Australian Institute of Management
Australian Mint Oils & Flavours Pty Ltd
Barry Callebaut Asia Pacific
Bronson & Jacobs Pty Ltd
Buhler AG
Bundaberg Sugar Ltd
Calico Cottage Fudge Systems Pty Ltd
Carroll Partners Pty Ltd
Cathay Pigments Australia Pty Ltd
Chr. Hansen Pty Ltd
Commonwealth Bank of Australia
Confectionery Consulting - Apercu Pty Ltd
Controlled Climate Logistics Pty Ltd
CRT Group
Danisco Australia
Detmold Flexible Packaging
DTS Food Laboratories
EFCA Pty Ltd
Elliott Automation
Essential Flavours & Ingredients Pty Ltd
Firmenich Ltd
Food Chem Trading Pty Ltd
FTA Food Solutions Pty Ltd
Gelita Australia Pty Ltd
Givaudan Australia Pty Limited
Huhtamaki Australia Pty Ltd
IMCD Australia Limited
Innovia Films Pty Ltd
Insurance Solutions Corporation Pty Ltd
International Spice Corporation Pty Ltd
Invita Australia Pty Ltd
Juremont Pty Ltd
Kerry Bio-Science
Kingfood Australia Pty Ltd
Kingsway Confectionery
Langdon Ingredients
Mandurah Australia Pty Ltd
Manildra Group
Mastertaste - A Kerry Group Company
Med-Chem Ingredients Pty Ltd
Murray Goulburn Co-operative Co Ltd
MWT Foods
National Australia Bank
NID Pty Ltd
Pacific Resources International Pty Ltd
Peanut Company of Australia Limited
Peerless Foods
Penford Australia Limited
Plantic Technologies Ltd
Ravenswood Australia
Richard Foot Pty Ltd
Sabpac Pty Ltd
Salkat Australia Pty Ltd
Scalzo Food Industries
Select Harvests
Selpak Automation Pty Ltd
Sensient Technologies Australia
SGS Australia Pty Ltd

Shorko Australia Pty Ltd
St.George Bank Limited
Sugar Australia Pty Limited
Symrise Pty Ltd
Tate & Lyle ANZ Pty Ltd
The Product Makers (Aust) Pty Ltd
TNA Australia Pty Ltd
Walls Machinery Pty Ltd
William Angliss Institute

New Zealand

APS Food & Nutrition (NZ)
Bronson & Jacobs NZ Division
Danisco NZ Limited
Fonterra Co-operative Group Limited
Gelita NZ Ltd
Ingredient Techniques New Zealand Limited
International Flavours & Fragrances NZ Ltd
Invita NZ Ltd
Kauri New Zealand Limited
New Zealand Sugar Company Limited
Penford New Zealand Ltd
Production Techniques Ltd
Sensient Technologies New Zealand
Taura Natural Ingredients Ltd
TNA New Zealand Ltd
Zymus International Ltd

International

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MC / Manufacturing Confectioner
PMCA