

# Australian Food and Grocery Council SUBMISSION

MAY, 2012

**TO:**

AUSTRALIAN AND NEW ZEALAND PRODUCTIVITY  
COMMISSIONS

**IN RESPONSE TO:**

STRENGTHENING ECONOMIC RELATIONS BETWEEN  
AUSTRALIA AND NEW ZEALAND, ISSUES PAPER

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

The membership of 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 processed food, beverage and grocery products sectors.

With an annual turnover of \$108 billion, Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity. The industry is similar in size to the mining sector.

Manufacturing of food, beverages and groceries in the fast moving consumer goods sector<sup>1</sup> is Australia's largest and most important manufacturing industry. Representing 26 per cent of total manufacturing turnover, the sector is the second largest industry behind the Australian mining sector and accounts for over one quarter of the total manufacturing industry in Australia.

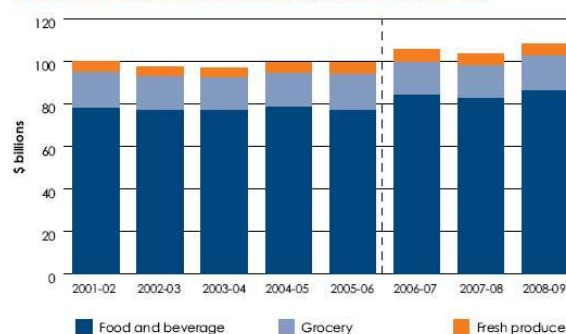
This growing and sustainable industry is made up of over 30,100 businesses and accounts for \$46 billion of the nation's international trade. The industry spends \$368 million a year on research and development.

The food and grocery manufacturing sector employs more than 312,000 Australians, representing about 3 per cent of all employed people in Australia, paying around \$13 billion a year in salaries and wages.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost half of the total persons employed being in rural and regional Australia<sup>2</sup>. It is essential for the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

Australians and our political leaders overwhelmingly want a local, value-adding food and grocery manufacturing sector.

Figure 4.1: Composition of the industry's turnover (\$2008-09)



Source: ABS, catalogue number 8221.0 and 8159.0

<sup>1</sup> Fast moving consumer goods includes all products bought almost daily by Australians through retail outlets including food, beverages, toiletries, cosmetics, household cleaning items etc.

<sup>2</sup> About Australia: [www.dfat.gov.au](http://www.dfat.gov.au)

## EXECUTIVE SUMMARY

AFGC supports the principle of the single economic market (SEM) and the key focus of the current work plan around reducing transaction costs, lessening compliance costs and uncertainty, and increasing competition.

AFGC supports the principles intended to guide the identification and analysis of options to achieve the aims of the SEM and in particular that:

*“Measures should deliver substantively the same regulatory outcomes in both countries in the most efficient manner.” (p6)*

AFGC supports world class, efficient regulatory systems which encourage innovation and investment and ensure that Australia’s manufacturing sector is sustainable.

Compliance with regulation is always costly; compliance with ineffective, inefficient or unnecessary regulation is wasteful in the extreme. It reduces business profitability directly, undermines investment attractiveness and diverts funds from innovative activities necessary for continued competitiveness and productivity growth. It is essential that regulation does not impose unnecessary costs and burdens on the food and grocery sector.

Regulatory systems should be accessible; transparent and predictable. They should balance the risk posed by a product with the effort required to manage this risk whilst providing companies with the framework and direction to continue to provide better and more targeted products to meet the needs of consumers.

AFGC makes the following recommendations in relation to strengthening economic relations between Australia and New Zealand:

- The Study supports a commitment by Governments to due processes in the development of regulations, with particular emphasis on reducing the burden of food labelling regulation.
- The Study considers examining the opportunity for a trans -Tasman mechanism for consumer law, ensuring that no additional regulatory or cost burden is added to industry in either country.
- The Study considers examining the opportunity for a trans -Tasman mechanism to have closer alignment of processes for dealing with MRL’s.
- The Study considers examining the opportunity for a trans -Tasman mechanism to have a single harmonised process for dealing with Trade Measurement and in particular the requirements of AQS.
- The Study considers examining opportunities to develop better anti-dumping laws, whilst maintaining a commitment to free trade and the obligations and principles of international trade rules.
- The Study considers examining opportunities for stronger enforcement of non-compliant and unsafe product with respect to anti-competitive dumping behaviour.

AFGC stands ready to provide further input into the Productivity Commission review and would welcome the opportunity to meet with the Commission to discuss this submission further.

## 1. INTRODUCTION

The Australian Food and Grocery Council (AFGC) welcome the opportunity to provide a written submission to the Australian and New Zealand Productivity Commissions on *Strengthening Economic Relations between Australia and New Zealand*.

AFGC is ready to work with the Commissions to support increased economic integration and improved economic outcomes between Australia and New Zealand to enable industry to innovate and achieve sustainable growth.

This submission is in two parts:

1. Comments in relation to the food and grocery industry in Australia provided by way of background to support our submission; and
2. Comments in relation to regulatory reform in the context of supporting closer economic relations.

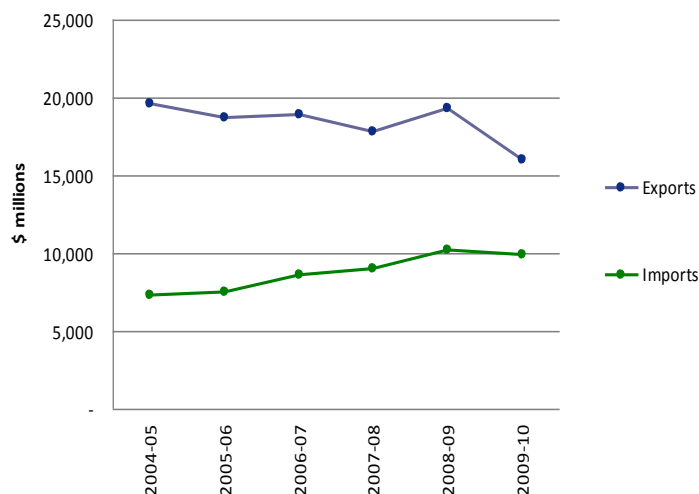
## 2. GENERAL COMMENTS

### 2.1. Overview – the current situation

The food manufacturing industry is, by and large, a success story. It provides an abundance of wholesome foods - safe, nutritious, convenient and affordable – from which Australians can construct healthy diets. Moreover, as the largest manufacturing sector, it contributes substantially to economic activity employing many Australians directly and indirectly, with almost half in regional Australia. Through the 1990s and into the first part of the last decade, exports from the sector also grew reaching \$17 -18b p.a. by 2004-2005<sup>3</sup>.

More recently, however, the industry has been under pressure from a number of factors in both export and domestic markets. The clearest empirical evidence for the loss of international competitiveness is no, or sluggish, growth in exports of processed food products, coupled with growing numbers of imported food products (Figure 1) in recent years.

**Figure 1. Imports and exports of substantially transformed food products**



In 2010 -11, total imports exceeded industry exports by \$2.7 billion – continuing the recent trend of the industry switching from being a net exporter to net importer. The industry’s trade deficit increased by 48.5% from \$1.8 billion in 2009 -10 to \$2.7 billion in 2010 -11.<sup>4</sup>

<sup>3</sup> AFGC and KMPG. *State of the Industry 2010*. Essential information: facts and figures. Australian Food and Grocery Council. Oct 2010.

<sup>4</sup> AFGC and KMPG. *State of the Industry 2011*. Essential information: facts and figures. Australian Food and Grocery Council. Oct 2011

The major factors contributing to the erosion of international competitiveness of the food manufacturing sector are:

- rising input costs – raw materials, energy, transport, labour are all going up in concert with prices establishing a long term upward trend;
- exchange rate effects – with a high Australian dollar imported foods are becoming more competitive and exports less competitive putting downward pressure on prices in the domestic market and providing less revenue from export markets;
- retail sector concentration - retailers are pressuring their suppliers as they engage in aggressive price competition to win market share. Private label is taking a greater share of sales and retailers are limiting the range of branded food products resulting in product delisting. This environment is particularly difficult for Australian SMEs; and
- regulatory compliance costs - State and Territory and Commonwealth regulations including food standards, environmental regulations, planning regulations, occupational health and safety and workplace relations impose a high regulatory burden on industry. The lack of uniformity across jurisdictions in particular creates unnecessary compliance costs.

The overall effect is a decline in margins and the profitability of the industry limiting funds available (including from raising debt) for investment and reinvestment in new plant and new process i.e. in innovation. This limits the growth in productivity – i.e. becoming more efficient and effective – necessary to remain competitive in international markets.

Other factors limiting the industry's ability to grow and prosper include:

- shortages in skilled workers – food companies are reporting difficulty in securing high calibre, technically trained professionals;
- declines in innovation support by Governments at state and territory level – the risk / reward balance where Governments acknowledge the broad community benefits of innovation are not being maintained; and
- trade barriers (tariffs and quotas) and bi-lateral agreements between other countries can penalise Australian exporters.

The aftermath of global financial crisis and the identification in Australia of the “two-speed” economy as a result of the continuing mining boom has led to increasing concerns, and public policy debate, regarding the health of other sectors of the economy, and particularly the manufacturing sector. Indeed, there is little doubt that growth in some sectors of the economy is flat to the extent that the Australian economy as a whole is likely to record sluggish growth in the immediate term.

The strength in the mining sector, coupled with the downturn in the global economy is particularly worrying due to the imbalance developing in the Australian economy. The fundamental concerns are firstly; that not all Australians are benefiting from the wealth being created by the mining boom, and secondly; should the mining boom end other parts of the economy will not be strong enough to buffer Australia against the shock sent through the whole economy.

AFGC considers, therefore, that there is a fundamental challenge for Governments to embrace policies to secure the long-term resilience of the Australian economy. Such resilience can only be assured through:

- diversity with a range of industries contributing to wealth creation;
- efficiency within all sectors, including government, to protect created wealth;
- innovation to accelerate wealth generation through advanced technologies and business practices; and
- a streamlined and consistent regulatory environment focused on reducing the burden imposed by red tape.

Specific policy targets should include:

- attractive to capital investment, including from multinational food and grocery companies, for investment in manufacturing in Australia and New Zealand, providing reasonable returns;
- a skilled, appropriately rewarded and flexible workforce;
- cost-effective infrastructure (roads, rail, ports, broadband) for the movement of goods, services and information;
- minimum effective regulation with minimum compliance burdens;
- integration of social, economic and environmental objectives consistent with moving the economy to a sustainable base;
- ongoing policy and regulatory reform to maintain productivity growth and competitiveness of both countries in the global economy; and
- coordinated innovation and R&D strategies.

Outcomes likely to flow from this include:

- expanding economies creating the wealth required to improve living standards across growing populations;
- greater certainty for business for investment and re-investment encouraging long term plans in advanced, skills-based industries;
- sustained employment across all sectors enabling Australians and New Zealanders to participate and work toward their own futures, contributing to the wealth of their respective nations; and
- protection of the natural environment for future generations through realistic pricing of environmental impacts.

### 3. REGULATORY REFORM

AFGC supports the principle of the single economic market (SEM) and the key focus of the current work plan around reducing transaction costs, lessening compliance costs and uncertainty, and increasing competition.

AFGC supports the principles intended to guide the identification and analysis of options to achieve the aims of the SEM and in particular that:

*“Measures should deliver substantively the same regulatory outcomes in both countries in the most efficient manner.” (p6)*

AFGC supports world class, efficient regulatory systems which encourage innovation and investment and ensure that Australia’s manufacturing sector is sustainable.

Compliance with regulation is always costly; compliance with ineffective, inefficient or unnecessary regulation is wasteful in the extreme. It reduces business profitability directly, undermines investment attractiveness and diverts funds from innovative activities necessary for continued competitiveness and productivity growth. It is essential that regulation does not impose unnecessary costs and burdens on the food and grocery sector.

Regulatory systems should be accessible; transparent and predictable. They should balance the risk posed by a product with the effort required to manage this risk whilst providing companies with the framework and direction to continue to provide better and more targeted products to meet the needs of consumers.

AFGC believe that regulation should:

- meet community and government expectations for safety and sustainability;
- minimise and prevent unnecessary regulatory burden;
- ensure a level playing field for industry and not impose unnecessary barriers of entry or exit to markets;
- recognise the multiplier effect of added cost that regulation has on product availability and cost through the supply chain; and
- recognise the size of the markets in Australia and New Zealand – we cannot be out of step with the rest of the world.

#### 3.1. Food Regulation

Australia New Zealand closer economic relations in the food sector are supported both by the Trans - Tasman Mutual Recognition Arrangement (TTMRA) and by the ANZ Treaty establishing a system for the development food labelling and compositional standards to harmonise food content and packaging between the two countries. These two bilateral arrangements mean that, for the most part, food regulation in the two countries is uniform, and in those few areas of non-uniformity, there is no trade barrier that prevents the compliant goods of one country from being sold in the other.

In broad terms, these arrangements have operated well. In particular, the operation of the TTMRA has been effective in ameliorating the Australian tendency to over-regulate foods, and has been the direct trigger for the development of joint ANZ Food Standards in relation to formulated caffeinated beverages and formulated beverages, as well as driving reform of dietary supplement regulation in New



Zealand. In this way, TTMRA has lived up to its promise of promoting the development of minimal effective regulation, which in the case of foods results in common food standards.

AFGC support the comment in the Productivity Commission report with respect to food regulation:

*“the Inter-Governmental Agreement on Food Regulation and the Joint Food Standards Setting Treaty underpin the food regulatory system within Australia and between Australia and New Zealand. However, differences between the two countries remain in the enforcement of regulations, food hygiene standards, and some other areas, creating potential costs.”*

AFGC advocate focus on food regulation reform to achieve further harmonisation with the aim of improving the long term sustainability of the ANZ food industry.

This requires an ongoing commitment to:

- The principles of a single, uniform and national food regulatory system;
- Food Standards Australia New Zealand (FSANZ) remaining the lead agency and mechanism for developing food regulation in Australia and (for food labelling and composition) New Zealand; and
- Conducting Regulation Impact Analysis (RIA) to ensure best practice in food regulation development.

### 3.1.1. Food labelling

Food labelling is an area of food regulation which continues to escape substantial reform, and yet is continually at the forefront of policy debate. It remains a highly contentious with many issues debated in the absence of an overarching food labelling policy pursued by Government. The recently completed comprehensive *Review of Food Labelling Policy and Law* (“the Blewett Review”) has done little to guide the development of policy, and certainly fell short of COAG’s aim of streamlining regulatory arrangements to reduce costs for industry, in line with its business regulatory reform agenda. Of the 61 recommendations, only 3 might have reduced costs for industry or government.

#### Recommendation 1:

AFGC recommends that the Study supports a commitment by Governments to due processes in the development of regulations, with particular emphasis on reducing the burden of food labelling regulation.

### 3.2. Consumer Law

In 2010 Australia undertook a comprehensive review of consumer protection and trade practices legislation, resulting in new Commonwealth legislation – “Australian Consumer Law” and with the agreement of Australian States and Territories to cede their individual rights and adopt a single national law which came into effect in January 2011. Subsequently New Zealand has recently reviewed its consumer laws and introduced updated provisions that are very similar to Australia.

Given that there is a high degree of similarity between Australia and New Zealand, there is some logic in taking one further step and examining the opportunity for a trans -Tasman mechanism to have a single harmonised consumer law ensuring that no additional regulatory or cost burden is added to industry in either country.

Recommendation 2:

AFGC recommends that the Study consider examining the opportunity for a trans -Tasman mechanism for consumer law, ensuring that no additional regulatory or cost burden is added to industry in either country.

### 3.3. MRLs

Maximum Residue Limits (MRLs) are handled differently between Australia and New Zealand, and sit outside The Agreement between the Government of New Zealand and the Government of Australia concerning a Joint Food Standards System (“the Treaty”) and the joint Australia New Zealand Food Standards Code (the Code). As a result, Australian importers and manufacturers are at a competitive disadvantage due to the Australian MRL’s, as the Australian standard requires an express permission for a food to contain a residue, otherwise it is not permitted.

There are a number of differences between Australia and New Zealand with regard to regulatory requirements for Maximum Residue Limits (MRLs) and their administration:

- in New Zealand the processes for registering new chemicals and specifying the appropriate MRLs are more streamlined and timely than in Australia;
- the Australian decision process has some features, absent in New Zealand, that could deliver better outcomes for business, including: a direct consideration of the compliance costs of business as part of the assessment and an appeals process; and
- while the administration and enforcement of MRLs in New Zealand is the responsibility of one body (the MPI), 22 state and territory departments/agencies have responsibility for some aspect of the administration and enforcement of MRLs in Australia.<sup>5</sup>

There is some logic in examining the opportunity for a trans -Tasman mechanism to have closer alignment of processes for dealing with MRL’s.

Recommendation 3:

AFGC recommends that the Study consider examining the opportunity for a trans -Tasman mechanism to have closer alignment of processes for dealing with MRL’s.

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<sup>5</sup> Performance Benchmarking of Australian and New Zealand Business Regulation: Food Safety

PC report 2009, [http://www.pc.gov.au/data/assets/pdf\\_file/0020/93503/food-safety-report.pdf](http://www.pc.gov.au/data/assets/pdf_file/0020/93503/food-safety-report.pdf)

### 3.4. Trade Measurement

Australia has only recently implemented national Trade Measurement laws. There is a difference between Australia and New Zealand in terms of the Average Quantity System (AQS) for trade measurement and this difference imposes a higher burden on Australian manufacturers as Australia has additional labelling requirements over and above those of New Zealand.

New Zealand has a “deemed to comply” interpretation for product imported from the EU whereas Australia does not and this creates an additional burden for importers who have to overlay labels for Australian bound product.

Given that there is a high degree of similarity between Australia and New Zealand, there is some logic in taking one further step and examining the opportunity for harmonisation of trade measurement legislation based on the New Zealand criteria.

#### Recommendation 4:

AFGC recommends that the Study consider examining the opportunity for a trans -Tasman mechanism to have a single harmonised process for dealing with Trade Measurement and in particular the requirements of AQS.

### 3.5. Anti-dumping - effectiveness of anti-dumping rules

AFGC has been concerned for a number of years that anti-dumping rules have not been effective enough at protecting the industry from anti-competitive dumping behaviour of some importers of food and beverage products. This led to AFGC developing and communicating to Government a number of guiding principles which anti-dumping policy and legislation should reflect as follows:

- Australian industry and particularly the manufacturing sector must have ready and easy access to measures that have the clear objective of preventing products from being dumped in Australia to the detriment of the domestic sector;
- Australian business should be able to compete equitably on the global market and anti-dumping measures should provide for transparent and equitable remedies but not allow or encourage vexatious or frivolous claims;
- the measures should be administered and processed in a timely way that minimises costs and uncertainty for the business and provides a swift remedy to any activity that is injuring, or will injure, the domestic sector;
- the anti-dumping legislation should provide clear, unambiguous and transparent definitions of what constitutes dumping and be able to report on the magnitude of imports and the proposed impact of the imported products on the domestic industry including final cost to the consumer; and
- the arrangements should provide for a transparent and equitable process for appeal from parties associated with any action.

The Australian food and grocery manufacturing industry does not seek protection nor unfair advantage. It does, however, seek adequate policy and regulatory measures that facilitate a competitive and innovative domestic industry which can compete in a global trading environment. Those measures should be effective at preventing Australian manufacturers being materially disadvantaged by subsidised and unsustainable products dumped on the Australian market.

AFGC welcomed the Government's announcement in June 2011 that it will establish the International Trade Remedies Forum and is a participant in the Forum. AFGC looks forward to working with Government on reforms which will lead to better anti-dumping laws, whilst maintaining a commitment to free trade and obligations and principles of international trade rules under the World Trade Organisation. AFGC considers key to those reforms will be new provisions for greater resource allocation to allow more rapid handling of alleged dumping practices.

Another important, and related issue, is parallel importing – that is the importing of branded products manufactured overseas, often to different commercial and regulatory requirements. Like anti-dumping, this is an issue of concern to the food and grocery sector and one which contributes to the challenge of maintaining a safe and sustainable sector in Australia. Parallel importing could raise serious concerns with respect to food standards and the health of Australian consumers specifically in relation to correct and accurate labelling requirements, compositional and safety standards.

Recommendation 5:

AFGC recommends that the Study consider examining opportunities to develop better anti-dumping laws, whilst maintaining a commitment to free trade and obligations and principles of international trade rules.

Recommendation 6:

AFGC recommends that the Study consider examining opportunities for stronger enforcement of non-compliant and unsafe product with respect to anti-competitive dumping behaviour.

## 4. CONCLUSION

AFGC supports a regulatory system that provides industry across Australia and New Zealand with the framework and direction to continue to provide better and more targeted products to meet the needs of consumers.

AFGC also supports world class, efficient regulatory systems which encourage innovation and investment and which ensure that Australia's manufacturing sector is sustainable.

AFGC stands ready to provide further input into the Productivity Commission review and would welcome the opportunity to meet with the Commission to discuss this submission further.

# Australian Food and Grocery Council

## SUBMISSION

### AFGC MEMBERS LIST AS

Arnett's Biscuits Limited  
Australian Blending Company P/L  
Barilla Australia Pty Ltd  
Beak & Johnston Pty Ltd  
Beechworth Honey Pty Ltd  
Beerenberg Pty Ltd  
Bickfords Australia  
Birch and Waite Foods Pty Ltd  
Bronte Industries Pty Ltd  
Bulla Dairy Foods  
Bundaberg Brewed Drinks Pty Ltd  
Bundaberg Sugar Limited  
Byford Flour Mills T/a Millers Foods  
Campbell's Soup Australia  
Cantarella Bros Pty Ltd  
Carman's Fine Foods Pty Ltd  
Cerebos (Australia) Limited  
Cheetham Salt Ltd  
Christie Tea Pty Ltd  
Church & Dwight (Australia) Pty Ltd  
Clorox Australia Pty Ltd  
Coca-Cola Amatil (Aust) Limited  
Coca-Cola South Pacific Pty Ltd  
Colgate-Palmolive Pty Ltd  
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Eagle Boys Pizza  
FPM Cereal Milling Systems Pty Ltd  
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Fibrisol Services Australia Pty Ltd  
Fonterra Brands (Australia) Pty Ltd  
Food Spectrum Group  
Frucor Beverages (Australia)  
General Mills Australia Pty Ltd  
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GlaxoSmithKline Consumer Healthcare  
Go Natural  
Goodman Fielder Limited  
Gourmet Food Holdings  
H J Heinz Company Australia Limited  
Harvest FreshCuts Pty Ltd  
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Hoyt Food Manufacturing Industries P/L  
Hungry Jack's Australia  
IGEA Group  
Jalna Dairy Foods  
JBS Australia Pty Limited  
Johnson & Johnson Pacific Pty Ltd  
Kellogg (Australia) Pty Ltd  
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Kimberly-Clark Australia Pty Ltd  
Kraft Foods Asia Pacific  
Laucke Flour Mills  
Lion Dairy and Drinks

### AT 17 MAY 2012

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Manildra Harwood Sugars  
Mars Australia  
McCain Foods (Aust) Pty Ltd  
McCormick Foods Aust. Pty Ltd  
McDonald's Australia  
Merisant Manufacturing Aust. Pty Ltd  
Murray Goulburn Co-operative  
Myosyn Industries  
Nerada Tea Pty Ltd  
Nestlé Australia Limited  
Nutricia Australia Pty Ltd  
Ocean Spray International Inc  
Only Organic 2003 Pty Ltd  
Parmalat Australia Limited  
Patties Foods Pty Ltd  
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Food Spectrum Group  
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