



AUSTRALIAN  
FOOD AND GROCERY  
COUNCIL

**SUBMISSION**

**TO THE SENATE SELECT COMMITTEE ON CLIMATE POLICY**

8 April 2009

## PREFACE

The Australian Food and Grocery Council is the peak national organisation representing Australia's food, drink and grocery manufacturing 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 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 our members are substantial contributors 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 food manufacturing 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 enabling member companies to grow their businesses in a socially responsible manner.

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 approach to public policy to enable businesses to tackle the threats and grasp the dual opportunities of globalisation and changing consumer demands.

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## 1 OPENING STATEMENT

The Australian Food and Grocery Council (AFGC) welcome the opportunity to respond to the terms of reference established by the Senate Select Committee on Climate Policy. The AFGC is a member of the Australian Greenhouse Industry Network (AIGN) and supports the collective industry position and has drawn a number of positions and comments from the AIGN submission.

While the AFGC has not directly assessed the fundamental science which supports climate change as a result of global warming, the impact it may have on the environment and agricultural production systems or the overall impact on the Australian economy, we support and agree with the objective of reducing carbon emissions across the economy.

While we support the objective, the AFGC seeks to find solutions that allow the sector to remain profitable. This can be done by facilitating a shift in the way the economy sources and uses energy so that carbon emissions are reduced but ensuring that there is sufficient capacity in the economy to maintain global competitiveness.

The issue of reducing emissions is pressing and we agree that action needs to be taken in the short term. However, while we support the objective we are of the view that changes of the type that are being proposed can only be made by sectors that remain profitable. In addition the AFGC considers that if a policy of this magnitude is going to be implemented then it must be done right. Delays of one or two years should be considered with the critical objective of achieving the right outcome with the right policy mechanism. The objective should be to facilitate a shift in the way the economy sources and uses energy so that carbon emissions are reduced but ensuring that there is sufficient capacity in the economy to maintain global competitiveness.

The key issue for the AFGC is not a question of whether Australia should become more energy efficient and therefore reduce emissions, but by how much, by what means and at what cost to the economy. The accumulation of greenhouse gas emissions is a global problem. In the absence of a global approach, any domestic emissions trading scheme that imposes costs will make trade exposed domestic industry less globally competitive, and may well contribute to the relocation of the manufacturing base offshore, taking the emissions with it; but with no net environmental benefit. Notwithstanding the success of the food and grocery industry, it is facing significant challenges threatening its competitiveness and profitability *viz*: the real impacts of climate change; volatile input costs (energy, transport and raw materials); which have real threats to Australia as a manufacturing base.

## 2 EXECUTIVE SUMMARY

The AFGC recognises the need to reduce carbon emissions and for industry to become more energy efficient. In addition however the AFGC also recognises that with some fundamental shifts in the economy foreshadowed by the policy debate, industries such as the food, beverage and grocery will be negatively impacted.

It is the AFGC view that the current modelling has not provided sufficient consideration as to the impacts of the CPRS on the manufacturing sector. More specifically it does not take into account the impact of the policy on the largest sector within manufacturing, the food, beverage and grocery sector. The food and grocery sector operates on extremely small margins in what is an ever expanding global market. The Australian food and grocery

market is trade exposed and value chains source from the cheapest destination to maintain viability. In the absence of a similar cost in other countries, the ability of Australian food and grocery companies to competitively supply both the domestic and exports markets and continue to employ Australian workers will be diminished. If the current flawed policy approach is implemented it will simply mean exporting jobs and emissions offshore while doing very little to reduce environmental impact.

Given the absence of a global price or market for carbon the government proposal has not given sufficient consideration to the use of a consumption based model for carbon emissions. Such a system would allow the domestic industry to maintain competitiveness on like terms with countries that produce like goods in without the additional cost.

AFGC considers that the measures of all jurisdictions are potentially duplicative, confusing and compromise the national framework required to meet the objective of reducing greenhouse gas emissions at least cost. Their existence is a critical consideration in understanding the measures required in addition to an emissions trading scheme and AFGC urges the Commonwealth Government to take a strong lead in pursuing this agenda.

### **3 EMISSIONS TRADING POLICY**

An international framework that progresses the national commitments under the UNFCCC will be critical in meeting any ambition to implement an international emissions trading scheme. Until this happens it would seem improbable that an international emissions trading scheme that encompasses the majority of emissions in the majority of countries will emerge.

On the other hand, the EU will continue its scheme beyond 2012 and it is possible that individual countries, or groups of like-minded countries, could implement emissions trading schemes. While this is not the only possible outcome, the result will most likely be a 'constellation' or 'patchwork' of different national and regional schemes, with hopefully an open-door policy for new countries and regions to 'opt-in'.

If this assessment is realistic, the chance of a single, global emission price emerging anytime in the next investment cycle is very remote. It is not unlike the probability of all global trade barriers being removed in the next 20 years, that is, AFGC expects any global scheme to have competitiveness distortions.

This assessment should by no means be taken to be a pessimistic view. Rather it is reached with full recognition of the need to accommodate the genuine aspirations of all nations, not least those of developing countries, to meet their social and economic objectives; and the cause for optimism is that many countries are likely to adopt their own 'targets' in the absence of an international agreement.

However, in AFGC's view, the Australian Government should be cautious in adopting an overly ambitious domestic 'trajectory' or 'budget' for its emissions trading scheme in advance of a better understanding of the position of other 'advanced' countries. It is important to note that Australia's share of global greenhouse gas emissions is less than 1.5%<sup>i</sup>, there is, generally speaking, little or no global environmental benefit (in respect of

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<sup>i</sup> World Resources Institute, *Navigating the Numbers: Greenhouse Gas Data and International Climate Policy*, Chapter 2, 2005, [http://archive.wri.org/publication\\_detail.cfm?pubid=4093](http://archive.wri.org/publication_detail.cfm?pubid=4093)

global greenhouse emissions) in Australia imposing a harsher carbon constraint relative to other 'advanced' countries' commitments.

AFGC endorses the CPRS White Paper test for setting Australia's emission budget at a level that is commensurate with "advanced economies taking on reductions comparable to Australia". However, both the -5% and the -15% targets – representing a 25% to 35% reduction in emissions relative to expected trends and a 34% to 41% reduction from 1990 per capita emission levels – are stronger than other wealthier countries including the EU, the USA and the UK.

Analysis of the Treasury modelling estimates that these targets mean that Australians could incur wealth losses, as measured by loss in GNP, about 3 times higher than the Americans (compare Australia -4% with USA -6% of 1990) and substantially more than 4 times higher than the losses that Europeans (compare Australia -14% and EU -34% of 1990) bear in 2020.

The reality of an imperfect global response to greenhouse emissions abatement dictates that a key issue for policymakers is whether a national emission trading scheme can be designed to preserve for a transitional period the major competitive advantages Australia enjoys.

The principal dilemma for Australia is the fact that overseas competitors for many of the industries which have been the drivers of Australian prosperity and growth for over three decades, are located predominantly in countries that will not impose an equivalent greenhouse gas emissions penalty in the foreseeable future. Key competitors for the food and grocery industry are in Asia, in South America and in Europe. To impose any significant penalty on Australian industries, whether import competing or exporting, when competitors remain exempt would encourage the diversion of investment to offshore jurisdictions for no environmental benefit. The requirement to preserve competitiveness is therefore potentially long-lived, and must address both existing operations and new investment.

The CPRS proposes a program of permit allocations to emission intensive trade-exposed industry and Climate Change Action Fund (CCAF) grants for other industry. The proposed program, however, does not offset the competitive disadvantage of trade-exposed businesses, and losses of jobs and investment will be inevitable, for minimal environmental gain under the -5% unilateral target. Within the coverage of the proposed emissions trading scheme, and leaving aside agriculture, 45% of Australia's emissions are associated with potentially trade-exposed businesses. However, the CPRS asserts that just 25% of permits will be sufficient to ensure no loss of competitiveness, investment and jobs from these businesses.

A key issue promoted in this debate is that transitional assistance to trade-exposed businesses is a gift of taxpayers' money to 'rent seekers'. The White Paper estimates that at a price of \$25/tCO<sub>2</sub> the emission permits in the trading scheme will be valued at about \$11.5 billion in 2010-11. This \$11.5 billion is not a magic pudding of taxpayers' money created (from nothing). Rather it derives from the increased costs of living for consumers and the lost profits of businesses. In particular, most trade-exposed businesses are unable to pass-on any emission costs and no trade-exposed business will be able to recover all emissions costs. The result of the CPRS is that in 2010 the Government may impose over \$5 billion in costs on existing trade-exposed businesses, but is proposing to provide just \$3 billion in relief declining at a rate of 1.3% per annum for existing businesses – this is nothing more than a productivity tax.

AFGC agrees with AIGN estimates, assuming a historical growth rate in trade-exposed industries of 1.5% per annum excluding agriculture, that there is between \$25 and \$30 billion worth of permits unallocated by 2020<sup>ii</sup>. It appears as if there are sufficient permits to deliver a better outcome for all trade-exposed businesses without reducing the compensation to households proposed in the CPRS.

#### 4 COMPLEMENTARY POLICIES

The objective of developing a coherent and streamlined set of climate change measures across jurisdictions has long been requested by industry. In principle, this has been supported by Australian governments in successive iterations of a political commitment to a streamlining objective. However, in an overcrowded greenhouse and energy measures bandwagon – a 2008 audit by the Department of the Environment, Water, Heritage and the Arts has revealed over 140 Commonwealth and State (and Territory)<sup>iii</sup> measures – industry is yet to see any measure abolished and continues to witness the announcement of additional measures across jurisdictions with no regard for co-ordination, national consistency or efficiency, and contrary to stated cross-jurisdictional intentions.

AFGC suggests that the measures of all jurisdictions are potentially duplicative, confusing and compromise the national framework required to meet the objective of reducing greenhouse gas emissions at least cost. Their existence is a critical consideration in understanding the measures required in addition to an emissions trading scheme and AFGC urges the Commonwealth Government to take a strong lead in pursuing this agenda.

However, AFGC would note that the definition of ‘measures additional to emissions trading’ should be broad and cover policies, programs and regulations that include as their objective the reporting or reduction of greenhouse gas emissions or energy, the latter as a proxy for emissions. In the case of regulations, this would include any reference to greenhouse gas abatement for project approvals, and licensing processes and conditions. Given there will be a national emissions trading scheme there is no further need for project approvals and licensing to include the examination of greenhouse gas emissions. Specifically, and importantly, at the Commonwealth level, this includes any suggested amendment of the Environment Protection and Biodiversity Conservation Act (EPBC Act) to include a greenhouse “trigger”.

AFGC supports the call from AIGN for a competition policy style of agreement between the Commonwealth and the States and Territories. The agreement would see revenues withheld by the Commonwealth where measures retained or introduced by States are not consistent with a national emissions trading scheme as determined by the Productivity Commission.

With an emission trading scheme there will be no market failure case for mandatory energy-efficiency programs targeted at industry to address. Further, these measures become an unnecessary compliance burden, which distracts companies from directly focussing on their obligations under an emissions trading scheme. In that context, the Energy Efficiency Opportunities program should be terminated when the program reaches its first review period in 2011. The same result needs to be enforced for State based mandatory energy efficiency measures.

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<sup>ii</sup> Australian Industry Greenhouse Network.

<sup>iii</sup> Greenhouse Challenge Plus review of climate change policy measures

In February 2008 the Minister for Climate Change, Penny Wong said,

*‘I would like to indicate today a number of initial design principles that will guide development of emissions trading over the next year or so....’*

*Fifth, the design will address the competitive challenges facing emission-intensive trade exposed industries in Australia. The introduction of a carbon price ahead of effective international action can lead to perverse incentives for such industries to relocate or source production offshore. There is no point in imposing a carbon price domestically which results in emissions and production transferring internationally for no environmental gain. Therefore, we need to assess carefully the impact of the scheme on industries for which this might pose a real risk. In addressing competitiveness concerns during this phase, attention will also need to be paid to ensuring that incentives remain for these industries to adjust their emissions profiles consistent with an emerging global carbon constraint.*

*The Government recognises that not only emissions-intensive trade-exposed industries would be affected by a carbon price. The scheme will also address the impact on strongly affected industries.’<sup>iv</sup>*

AFGC acknowledges the terms of reference of the Committee, particularly its recognition that climate policies need to:

- (i) reduce carbon pollution at the lowest economic cost,*
- (ii) put in place long-term incentives for investment in clean energy and low-emission technology, and*
- (iii) contribute to a global solution to climate change;*

AFGC is principally concerned with the development of climate policy that delivers these objectives, noting, as the Minister clearly did in her February 2008 speech, that Australian domestic action that has no global environmental gain, at the expense of our own prosperity and growth, is counterproductive to the ideal of long term emissions reduction to avoid dangerous climate change.

AFGC would urge that future negotiations of Australian commitments under an international framework should not be compromised by decisions made by governments with respect to a domestic policy agenda. Australia’s share of global emissions are such that there will be little gained by adopting comparatively harsh domestic emission trajectories or budgets prior to the successful negotiation of a new international framework. Accordingly, Australian domestic policy will need to be flexible to account for changes in knowledge and international circumstances, whilst accommodating the management of uncertainty so that industry can make sound investment decisions.

AFGC still contends that properly designed, an emission trading scheme can deliver the objective of emissions reduction at lowest possible cost. However, the CPRS Bills do not do the job, particularly for trade exposed and strongly affected industries.

Further, industry support for the introduction of an emissions trading scheme is contingent on the removal of the large number of prescriptive and economically inefficient policies that are currently used to regulate greenhouse gas emissions from industry.

**It is possible however, that the CPRS can be reviewed and revised to deliver Australia’s fair share of global emissions abatement, while supporting the competitiveness of those industries which underpin Australia’s economy, and current and future prosperity.**

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<sup>iv</sup> Speech to the AI Group Luncheon, 6 Feb 2008, *Climate Change: A Responsibility Agenda*.



## 5 NEED TO ADOPT THE BEST POLICY APPROACH

The AFGC supports the following principles of an emissions reduction scheme:

- 1) Climate change is best tackled from a position of profitability and global competitiveness.
- 2) The impact of the global financial crisis on the economy should be taken into account when assessing the capacity of the Australian economy to implement an emissions trading scheme in 2010.
- 3) There is no Australian solution to climate change, there is only a global solution.
- 4) Any emissions trading scheme must not result in the export of emissions and jobs.
- 5) Excessive haste carries great risk (to the resilience of our economy).

The AFGC has significant concern relating to the potential negative impacts the proposed CPRS will have on the food, beverage and grocery manufacturing sector. Obligations imposed up and downstream of the farm gate mean that carbon costs will be passed through the food supply chain to consumers. This will undoubtedly result in higher food, beverage and grocery prices. This issue has not been adequately addressed to date and the AFGC recommends Government conduct specific modelling of the impact on the prices of food and grocery products from the CPRS taking into account the capacity of the supply chain to absorb additional costs. The government White Paper suggests cost will increase by approximately 1% based on household energy consumption for heating cooling etc. It does not take into consideration the flow of costs through the supply chain where increased prices will be incurred at every stage and ultimately born by the consumer on essential items like bread, milk and sugar. The government White Paper suggests households will incur an average increase in spending of \$6 per week on household fuels but provides little detail on the increase in spending on community staples such as food and beverages. This is of some concern as Australian Bureau of Statistics figures indicate food and beverage spend represents approximately 20% of the average weekly spend where as energy represents only approximately 3% of household expenditure.

Global companies, which can take advantage of lowest cost locations, supply and distribution chains to ensure they remain competitive, are likely to move offshore and continue to produce emissions resulting in a negative impact both environmentally and economically. In the absence of similar schemes overseas the introduction of a CPRS creates an uneven playing field for Australian businesses and particularly those that compete with imports of similar goods. The Australian market has access to cheap and reliable energy supply which to some extent offsets the nation's high labour costs and remote geographical location compared to other manufacturing regions of the world. This comparative advantage will be eroded if Australia acts in isolation or more aggressively with economic means to reduce carbon emissions.

The ambitious time frame for the establishment of the emission trading scheme has required the fast track development of a number of key design aspects of the proposed arrangements. The AFGC would be supportive of a review of the proposed timeframe to ensure the policy can be implemented in a way that does not have unintended consequences but provides for a long term approach to the critical issue of global warming.

The proposed policy and associated legislation does not offset the competitive disadvantage of trade-exposed businesses, and losses of jobs and investment particularly in the manufacturing sector will be inevitable for minimal environmental gain (as goods will be sourced from countries that do not have a cost of carbon and are not required to reduce emissions). Within the coverage of the proposed emissions trading scheme, and leaving aside agriculture, 45% of Australia's emissions are associated with potentially trade-exposed businesses. However, the White Paper asserts that just 25% of permits will be sufficient to ensure no loss of competitiveness, investment and jobs from these businesses. Industry<sup>v</sup> estimates, assuming a historical growth rate in trade-exposed industries of 1.5% per annum excluding agriculture, that there is between \$25 and \$30 billion worth of permits unallocated by 2020. Clearly there are sufficient permits to deliver a better outcome for all trade-exposed businesses without reducing the compensation to households proposed in the White Paper.

### **5.1 NEED FOR PARITY FOR TRADE EXPOSED INDUSTRIES – THE URGENT NEED TO CONSIDER A ‘CONSUMPTION’ BASED APPROACH.**

The accumulation of greenhouse emissions is a global problem. In the absence of a global approach, any domestic emissions trading scheme that imposes costs will make domestic companies less globally competitive, and may well contribute to the relocation of the manufacturing base offshore, taking the emissions with it; but with no net environmental benefit. The potential for the cost impact of CPRS to erode the food, beverage and grocery industry's comparative advantage based around cheap energy, high quality inputs and available land should not be underestimated.

Given the absence of a global price or market for carbon there has not been sufficient consideration of the use of a consumption based model for carbon emissions. Such a system would allow the domestic industry to compete on like terms with the increasing level of imported food products. In addition it would have the significant benefit of reducing emissions without having the negative impact of driving manufacturing jobs and investment offshore to countries that do not have a similar cost impost placed on business. A consumption, rather than a production, based model is trade competitiveness neutral. Imports could be priced at a relative level to domestically produced goods. National concerns about carbon leakage and job losses are minimised as there is a level of equity for Australian industry<sup>vi</sup>.

**In the absence of a global approach, any domestic emissions trading scheme should provide a level playing field for impacted industries such as the food and grocery sector, until a binding international deal is brokered. This will ensure that any mechanism does not un-necessarily compromise the international competitiveness of the largest manufacturing sector in the economy without having any environmental benefit.**

The AFGC has noted the public debate on the features of both production-based and consumption-based models for addressing the climate issue. The claims for the consumption based model (see box) address many of the short comings of the production-based model which will need to be addressed by industry specific adjustments or carve-

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<sup>v</sup> Australian Industry Greenhouse Network.

<sup>vi</sup> Effective Climate Change Policy: The Seven C's Geoff Carmody and Associates October 2008.

outs, which ultimately may serve to undermine the effectiveness of reducing carbon emissions.

The AFGC will continue to examine all policy options for addressing climate change and will work with Government to secure the best outcome not only for the Australian food and grocery sector, but also for Australia as a whole as the AFGC considers them to be inextricably linked. The AFGC will continue, therefore, to test policy options against the yardsticks of affordability, competitive neutrality, equity and capability to deliver overall net carbon emission reductions.

Extract from Australian Financial Review 15 January 2009. *Consumption model the practical way to go for all.* Geoff Carmody.

*“The emission consumption model is practical. It starts with the production information required under the green/white papers. It uses Australia’s existing tax invoice system to pass carbon cost signals transparently down the supply chain to consumers, zero-rates exports (which then have carbon prices imposed by importers), and imposes a trade competitiveness-neutral border tax adjustment on competing imports. This ensures trade-neutrality and is World Trade Organisation compliant. There are no job losses overseas, and Australia’s own emission reductions make the same net contribution to global emissions reductions. All countries should adopt this model”.*

Inquires relating to this submission should be directed to:

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## AFGC MEMBERS LIST AS AT 18 DECEMBER 2008

Arnott's Biscuits Limited	General Mills Australia Pty Ltd	Johnson & Johnson Pacific Pty Ltd
Snack Foods Limited	George Weston Foods Limited	Pfizer Consumer Health
The Kettle Chip Company Pty Ltd	AB Food and Beverages Australia	Kellogg (Australia) Pty Ltd
Asia-Pacific Blending Corporation Pty Ltd	AB Mauri	Day Dawn Pty Ltd
Barilla Australia Pty Ltd	Cereform/Serrol	Specialty Cereals Pty Ltd
Beak & Johnston Pty Ltd	Don	Kikkoman
BOC Gases Australia Limited	GWF Baking Division	Kimberly-Clark Australia Pty Ltd
Bronte Industries Pty Ltd	George Weston Technologies	Kerry Ingredients Australia Pty Ltd
Bulla Dairy Foods	Jasol	Kraft Foods Asia Pacific
Bundaberg Brewed Drinks Pty Ltd	Weston Cereal Industries	Lion Nathan Limited
Bundaberg Sugar Limited	GlaxoSmithKline Consumer Healthcare	Madura Tea Estates
Cadbury Schweppes Asia Pacific	Golden Circle Limited	Manildra Harwood Sugars
Campbell's Soup Australia	Goodman Fielder Limited	Mars Australia
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Cerebos (Australia) Limited	Quality Bakers Aust Pty Ltd	Mars Petcare
Christie Tea Pty Ltd	H J Heinz Company Australia Limited	Mars Snackfood
Clorox Australia Pty Ltd	Hans Continental	McCain Foods (Aust) Pty Ltd
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Coca-Cola South Pacific Pty Ltd	Hoyt Food Manufacturing Industries Pty Ltd	Merisant Manufacturing Aust. Pty Ltd
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Danisco Australia Pty Ltd		Nestlé Foods & Beverages
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DSM Nutritional Products		Nestlé Nutrition
Earlee Products		Foodservice & Industrial Division
Ferrero Australia		Novartis Consumer Health Australasia
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Foster's Group Limited		Parmalat Australia Limited
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		Peanut Company of Aust. Limited

Procter & Gamble Australia Pty Ltd  
 Gillette Australia  
 PZ Cussons Australia Pty Ltd  
 Queen Fine Foods Pty Ltd  
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 Ridley Corporation Limited  
 Cheetham Salt Limited  
 Sanitarium Health Food Company  
 Sara Lee Australia  
 Sara Lee Foodservice  
 Sara Lee Food and Beverage  
 SCA Hygiene Australasia  
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 Simplot Australia Pty Ltd  
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 The Wrigley Company  
 Unilever Australasia  
 Wyeth Australia Pty Ltd  
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 Coca-Cola Amatil (Aust) Limited  
 Foster's Group Limited  
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