



AUSTRALIAN
FOOD AND GROCERY
COUNCIL

SUBMISSION TO

Department of the Environment, Water, Heritage and the
Arts – Consultation paper on a National Waste Policy:
Managing Waste to 2020.

13 May 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 a substantial contributor to the economic and social welfare of all Australians. Effectively, the products of AFGC's member companies reach every Australian household.

The industry has annual sales and service income in excess of \$70 billion and employs more than 200,000 people – almost one in five of the nation's manufacturing workforce. Of all Australians working in the industry, half are based in rural and regional Australia, and the 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 increasingly 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 EXECUTIVE SUMMARY

The current fragmented and *ad hoc* approach to waste management across state jurisdictions requires urgent attention to ensure that resources are used efficiently and measures are adopted at a national level to minimise the impact of waste on the environment.

The issues of key importance to the food and grocery industry from a waste management perspective include food and organic waste, packaging waste, waste water and prescribed waste policy. The industry is of the view that a commonwealth waste policy should provide clear guidance and direction in terms of principles and priorities for the states and other key stakeholders to apply and implement as appropriate. If the state jurisdictions retain control of waste management they should be required to adhere to the overarching priorities and principles established within a national waste policy. While flexibility is important given the nature and complexity of waste there is a clear need for uniform responses to ensure a truly sustainable waste management strategy can be implemented.

A streamlined and coordinated policy approach to waste management incorporating a range of appropriate instruments both voluntary and regulatory to guide and promote resource efficiency should be pursued. In terms of regulations the AFGC seeks adoption of a best practice approach that includes evidence based objectives with a combination of appropriate instruments and measures.

National information on waste and recycling performance is limited, which makes comparison of performance across state jurisdictions problematic. The National Waste Policy should include a focus on improving national data to ensure relevant initiatives are evidence based.

Waste management policy should incorporate environmental, social and economic factors to be truly sustainable. The policy for 2020 should develop strategies that provide a national focus that facilitate and support research and development and implementation of new technologies to manage priority wastes such as organic and prescribed wastes. The policy should provide clear leadership and direction for business, government and the community and identify priority issues to be addressed while also having strong linkages and coordination with the climate change policy and any emissions reduction mechanisms.

As a guide, successful models such as the National Packaging Covenant and other co-regulatory and cooperative approaches to product stewardship, should be supported and continued to ensure the impacts of waste can be managed and minimised.

1.1 RECOMMENDATIONS

- A national waste policy should provide overarching approach that sets high level priorities and objectives that individual jurisdictions can apply.
- The national waste policy seek to streamline and coordinate waste strategies across jurisdictions.
- The national waste policy incorporates a comprehensive and value chain approach.
- That the national waste policy adopt a best practice regulatory approach that includes clear objectives, is evidence based, focuses on tangible or measurable outcomes and considers a combination of appropriate voluntary and regulatory measures.
- The national waste policy should include as a key objective, a focus on improving national data and its management to ensure policy initiatives can be evidence based.
- The national waste policy should have strong linkages to the issue of climate change and emissions reductions and provide for the appropriate measures to work cooperatively across jurisdictions and sectors on this critical issue.
- A national waste policy should provide leadership and direction and have clear objectives and identify priority issues to be addressed – including food, organic and prescribed waste and measures that reduce the associated greenhouse gas emissions.
- The national waste policy should provide guidance on the role of relevant stakeholders.
- The government endorse the National Packaging Covenant as a successful product stewardship model and continue to support it as the sole instrument for managing consumer packaging waste in Australia.
- The national waste policy should take a life-cycle approach to waste management that seeks to avoid waste through improvements in design, production processes and transport.
- That the Government include in the national waste policy agenda a more proactive policy approach to the issue of waste water treatment, including the issues of water availability, security and reuse.

1.2 FOOD AND GROCERY INDUSTRY PERSPECTIVE

The AFGC welcomes the agreement by State and Territory Environment Ministers to develop a national policy to deal with Australia's ongoing waste challenge and is pleased to provide input on the priority issues to be considered and how these might be addressed.

The decision to have a national waste policy represents a fundamental shift in thinking about how collective action by industry, government and the community can manage Australia's waste issues. Waste policy has not been considered in the national context since 1992, when COAG agreed to the National Strategy for Ecologically Sustainable Development. The current fragmented and *ad hoc* approach to this important issue requires urgent attention to ensure that resources are used efficiently and measures are adopted at a national level to minimise the impact of waste on the environment.

The food, beverage and grocery industry sees significant benefit in a streamlined and coordinated policy approach to waste management. The approach should incorporate a range of appropriate instruments both voluntary and regulatory to guide and promote resource efficiency. The issues of key importance to the industry from a waste management perspective include food and organic waste, packaging, waste water treatment and prescribed policy. The industry is of the view that a commonwealth waste management policy should provide clear guidance and direction in terms of priorities and initiatives for the states and other key stakeholders to apply and implement as appropriate.

Packaging plays a critical role in the food and grocery supply chain. It reduces food waste before consumption and delivers products through the supply chain in a way that maintains quality and hygiene. Demographic trends including household size, increased disposable income and factors such as consumer health, safety and convenience have direct impacts on packaging that may run contrary to waste reduction. While producing smaller packages in response to these demographics may result in increased packaging, it can also substantially reduce food waste even further. Such factors contribute to the challenge of balancing the sometimes conflicting demands of reducing the impact of packaging on the environment and the important role of packaging in the value chain.

The food, beverage and grocery industry has contributed to the significant increase in packaging recycling efforts by its support and commitment to the National Packaging Covenant (NPC) which has, among other things, assisted kerb-side recycling programs widely embraced by Australians in their homes and communities and other actions by the commercial and industrial sectors. While recognising some of the improvements and refinements that have and will continue to be made, the food and grocery industry is of the view that the co-regulatory approach National Packaging Covenant represents an excellent model on which to based future waste management strategies for selected waste streams. It has the support of all key stakeholders that can contribute to solutions to waste management problems, i.e. industry, local government, state and commonwealth governments and non government organisations. It provides a valuable forum where parties can collaboratively work towards achieving goals and targets in a constructive and proactive way. The Covenant and other co-regulatory and cooperative approaches to product stewardship should be supported and continued to ensure the impacts of waste can be managed and minimised.

Current initiatives on waste at community, industry and government levels need to be assessed to ensure they are delivering the right outcomes – that is mitigating environmentally damaging waste handling practices. The AFGC advocates a holistic, coordinated supply chain wide approach.

A national waste policy will provide much-needed clarity on the appropriate measures needed to address each of the many issues. It also affords a timely opportunity to revisit waste policy in the context of broader Government policies on climate change and sustainability. This is particularly important in light of policy development around the CPRS and the impact it may have on waste management and recycling. Accordingly waste management policy should have a clear and coordinated link with climate change policy and any emissions reduction mechanism.

1.3 CURRENT GOVERNANCE ARRANGEMENTS

The AFGC is of the view that there are opportunities to further coordinate, harmonise and streamline approaches to waste management across jurisdictions. Waste management is primarily the responsibility of state, territory and local governments which enact policy measures and instruments to achieve waste or resource recovery objectives. All states and territories have in place waste policies/strategies and/or legislation to protect the environment and conserve natural resources - for example there is variances in the approaches to landfill, waste treatment legislation and enforcement which could be remedied. This fragmented approach leads to confusing practices and responses such as misinterpretation among consumers and business of what is and is not recyclable and what can and cannot go to landfill. A national waste policy should provide overarching approach that sets high level priorities and objectives that individual jurisdictions can then apply and adapt while maintaining a level of consistency and coordination with the national approach.

Recommendation

A national waste policy should provide an overarching approach that sets high level priorities and objectives that individual jurisdictions can apply.

It is the AFGC view that there could be more effective coordination among various government departments and legislative instruments in relation to waste management. A holistic and value chain approach should be incorporated into the national waste policy to ensure complementary measures that have a clear and recognisable benefit and that can add value to existing legislation can be implemented. Further to this point currently the waste management industry is experiencing severe difficulty in response to the global financial crisis. Prices for recyclate have been decimated and many stakeholders in the sector and experiencing un-precedented financial difficulty which may have a flow on impact to waste management services more generally. The AFGC is of the view that there may be a potential risk to recycling services which would represent a backwards step in the significant progress that has been made over recent years. A national policy should consider the provision of appropriate measures to ensure the viability of the waste management sector in the event of extraordinary occurrences.

The AFGC view is that there is an opportunity to reduce the regulatory burden and the increasingly complicated and administrative burden waste management procedures place on business. Environmental regulation is increasing and has been for some time. What industry needs is to have waste management regulation streamlined and implemented in way that responds to the needs of environmental, social and economic factors to be truly sustainable. The policy for 2020 should develop strategies that provide a national focus that facilitates and supports research and development and implementation of new technologies to manage priority waste such as organics and prescribed waste.

Recommendation

The national waste policy seek to streamline and coordinate waste strategies across jurisdictions.

The national waste policy incorporates a comprehensive and value chain approach.

1.4 REGULATION

The AFGC seeks a best practice approach to waste management regulation.

From a policy and regulatory development perspective the AFGC seeks the agreement and adoption of key ground rules to be the core of the national waste policy. By this we mean policy and regulatory instruments that are based on clear evidence and have a focus on tangible and measurable outcomes. The benefits and costs of any proposed waste management or reduction regulations should be assessed in accordance with COAG principles and via the regulatory impact statement process. The resulting policy framework should have clear objectives and provide for the appropriate tools through which the policy can be applied and implemented. These include where appropriate, legislation, co-regulatory arrangements, voluntary industry codes and guidelines that assist in the implementation and provide flexibility for industry and the community. To complete the process the policy approach should have relevant compliance procedures in terms of enforcement and methods of monitoring the implementation of the policy. Importantly the regulatory approach should also allow for amendment, revision and ultimately removal of any instruments incorporated into the policy as developments in technology and innovation find ways to correct the original market failure.

Specifically in relation to packaging waste, the adoption of any additional or state regulation such as a Container Deposit Legislation (CDL) is in the AFGC's view contrary to the National Partnership Agreement to Deliver a Seamless National economy and adds to the regulatory burden on industry and potentially increased costs to the community and consumers.

Recommendation

That the national waste policy adopt a best practice regulatory approach that includes clear objectives, is evidence based, focuses on tangible or measurable outcomes and considers a combination of appropriate voluntary and regulatory measures.

1.5 DATA

National information on waste and recycling performance is limited and there are differences from jurisdiction to jurisdiction in how data is collected and reported. This makes comparison of figures such as disposal and recovery rates across states and territories problematic. The National Waste Policy should include as a key objective, a focus on improving national data and its management to ensure policy initiatives can be evidence based.

Currently, lack of data inhibits government and others from identifying problems and developing effective solutions. As identified in the Senate Inquiry into the Management of Australia's Waste Streams report (www.aph.gov.au/senate/committee/eca_ctte/aust_waste_streams/index.htm) and the 2006 Productivity Commission report on waste management (www.pc.gov.au/projects/inquiry/waste/docs/finalreport), there is a lack of consistent and complete waste data to inform planning for and management of waste.

The lack of national waste data limits the information on which to make decisions about waste and to measure success in achieving national objectives. As well as gaps in statistical information, there are also limits to scientific knowledge about the environmental and health impacts and future risks of some of the materials disposed of to landfill. Data limitations clearly restrict the capacity of governments to develop effective policy responses. A national mechanism for collecting, storing, collating and accessing data would provide a valuable source of information on trends and performance of waste management. The mechanism would need to be nationally driven and incorporate agreed definitions and aggregation challenges.

The National Packaging Covenant demonstrates the need for clear and robust data to allow the setting of targets against which progress will be measured. Aspirational targets including 65% of all packaging to be recycled by 2010 were included as part of the Covenant from 2005 to 2010. The data on which the original target was based was inaccurate and subsequent investigation revealed the baseline was in fact lower than what was originally thought. Fortunately for the Covenant and packaging supply chain, this issue has been largely corrected via a cooperative and constructive process that is provided for within the National Packaging Covenant. The issue however demonstrates the risks involved in both setting targets for waste management, but also specifically relying on less than perfect data as the basis for target setting and highlights the need for improved and accurate methods of collecting and aggregating data on waste.

Recommendation

The National Waste Policy should include as a key objective, a focus on improving national data and its management to ensure policy initiatives can be evidence based.

1.6 NATIONAL APPROACHES TO WASTE MANAGEMENT STRATEGY

A national waste policy should provide clear leadership and direction for business, government and the community. The policy should have clear objectives and identify priority issues to be addressed – such as food and organic and prescribed waste. The national waste policy should have strong linkages to the issue of climate change and emissions reductions and provide for the appropriate measures to work cooperatively across jurisdictions and sectors on this critical issue.

The national waste policy should provide guidance on the role of relevant stakeholders in implementation - including commonwealth, state and territory governments, local governments, business and the community. A national approach should facilitate action from the various parties to take responsibility for relevant measures and encourage a collaborative approach to achieve desired outcomes.

Recommendation

The national waste policy should provide guidance on the role of relevant stakeholders.

The national waste policy should have strong linkages to the issue of climate change and emissions reductions and provide for the appropriate measures to work cooperatively across jurisdictions and sectors on this critical issue.

1.6.1 NATIONAL PACKAGING COVENANT

The National Packaging Covenant is an important and useful model in a national approach to waste management and is an example of a successful product stewardship scheme. The Covenant establishes a means for relevant parties in the product chain to share responsibility for the products they produce, handle, purchase, use and discard.

It has demonstrated an ability to provide genuine improvement to the packaging waste management system and identify best practice both for waste minimisation and recovery based on a co-regulatory and cooperative approach. It represents a successful partnership between industry and government, based on the principle of shared responsibility, incorporating all links in the packaging supply chain and all spheres of government to achieve a nationally consistent response to the lifecycle management of packaging. This includes its design, manufacture, use, recovery, and ultimate disposal.

The National Packaging Covenant:

- clearly articulates the objectives of consumer packaging waste management and the respective roles of government
- sets the basis for collaboration between jurisdictions – both under the voluntary National Packaging Covenant Council and the National Environment Protection Measures (NEPMs) of each jurisdiction
- provides the basis for an effective and efficient approach to domestic waste issues
- advances the environmentally sound management of materials and products through whole-of-life-cycle strategies to minimise waste and improve resource recovery (for example through better design)
- addresses identified market and governance impediments
- provides a balance of social, environmental and economic outcomes, and is implemented by an appropriate level of government, industry and community involvement, and
- provides the ability to address emerging issues and priorities.

The Framework for National Packaging Covenant MkIII going forward from 2010, as part of the principle of continuous improvement, is to focus additionally on product design using guidelines for sustainable packaging. This approach seeks to address the sound management of materials and products through whole-of-life-cycle strategies to minimise waste and improve resource recovery, and achieve best practice sustainability through product design.

Industry supports the 21st century approach to managing packaging waste through a revised and strengthened National Packaging Covenant as the sole policy instrument in managing packaging waste.

The National Packaging Covenant as the sole policy instrument for managing packaging waste gives certainty and stability to companies about the regulatory and policy framework in which they are operating. It assures industry the business certainty that other conflicting policy options such as packaging bans and container deposit legislation will not be introduced during the life of the Covenant so long as it continues to produce tangible and positive results. Further, any additional regulations would increase the costs placed on industry and the costs to the community.

A mid-term review of the National Packaging Covenant was favourable and identified the co-regulatory approach as a world-leading approach to the management of consumer packaging waste, incorporating the principle of continual improvement to achieve best practice waste management and resource recovery. Under the proposed National Waste Policy, the proposed aim is to achieve common goals and to align or complement actions taken to achieve these goals. The National Packaging Covenant is already aligned with these aims and is a clearly identified module under the national waste framework.

The term of the National Packaging Covenant is able to be aligned with the proposed National Waste Policy for Australia to 2020.

The adoption of additional regulation in relation to packaging waste

As the world looks toward the pursuit of more sustainable practices, the packaging supply chain is the best placed to tackle sustainability but what is needed is cooperative and innovative partnerships not restrictive legislation. Packaging is inherently able to deliver significant environmental benefits and the industry has taken the lead on improving recycling. Packaging plays a critical role in minimizing waste by protecting products from damage, enabling more efficient transport and increasing the shelf-life of perishable products.

Major brand-owners and other organisations in the packaging supply chain have made an ongoing commitment to provide up to \$15 million over five years, subject to matching funds from State and Territory Governments towards projects that improve the design, manufacture, recovery and recycling of packaging materials. The Federal Government agency, The Department of Environment, Water, Heritage and the Arts (and the previous agencies) and the relevant state governments have provided valuable funding of up to \$15m over the term of the Covenant which has made a valuable contribution and contributed to a national focus. The industry seeks a continuation of the funding subject to the final objectives and priorities of the new arrangements post, 2010 when the existing Covenant is scheduled to expire.

The Covenant is an excellent mechanism where all parties to the challenge of packaging waste can work collectively towards better outcomes. Isolated and narrow focussed alternatives to the Covenant based on onerous regulation such as container deposit legislation would provide an outdated and expensive approach that will not address all packaging. Adoption of such simplistic and misguided policies risk undermining the successful approach that has contributed to outstanding recycling rates over the last decade lifting it from below 40% (2003) of all packaging being recycled to almost 60% (2008) and forecasted to reach 65% by 2010.

The Covenant is a flexible arrangement that allowed business to make improvements to minimise impact of packaging on the environment. The covenant has contributed to the 700,000 tonnes (26%) reduction in the amount of packaging estimated to have been disposed to landfill between 2003 and 2008 - which is well ahead of expectations.

1.6.2 WASTE RESOURCES ACTION PROGRAM (WRAP)

The Waste Resource Action Program (WRAP) initiative in the United Kingdom also provides a useful insight into comprehensive waste management strategy. WRAP's goal is to ensure that the UK reduces waste, and recycles as much as possible, at minimum net cost. Like the National Packaging Covenant, WRAP is a joint industry and government approach to resource efficiency that is focussed on reducing waste to landfill, finding new uses for materials, and innovative ways to process recyclable materials more efficiently. Much of the success in this area is driven by the Courtauld Commitment – a voluntary agreement with the major retailers, brands and suppliers to reduce the impact of packaging.

Actions forecasted to be undertaken by WRAP include initiatives to

- changing behaviours amongst consumers and businesses for greater waste reduction and recycling;

- raising awareness and understanding of the value and importance of waste prevention and recycling (Love Food Hate Waste education campaign);
- working with those involved in the resource efficiency loop to make it easy, efficient and economically sustainable for everyone to reduce their waste and recycle more;
- finding technical solutions that make it possible to reduce or manage difficult materials that we currently struggle to minimise and recycle, including the investment in new technologies and recycling plants;
- researching data on the cost of waste to the United Kingdom;
- working in partnership with other delivery bodies to maximise our effectiveness; and
- reflecting the differing needs of each nation, whilst retaining the best aspects of a UK -wide approach.

Similar to the National Packaging Covenant which undertakes a range of similar activities, a comprehensive and well resourced supply chain wide approach to waste management such as the WRAP initiative could serve as a useful guide to Australia’s waste management policy. (www.wrap.org.uk).

Recommendation

A national waste policy should provide leadership and direction and have clear objectives and identify priority issues to be addressed – including food, organic and prescribed waste and measures that reduce the greenhouse gas emissions.

The government endorse the National Packaging Covenant as a successful product stewardship model and continue to support it as the sole instrument for managing consumer packaging waste in Australia.

1.7 WASTE AVOIDANCE AND RE-USE

The AFGC supports the waste hierarchy approach that minimises and avoids waste, promotes the reuse and recycling of materials and minimises the amount of waste sent to landfill as a basis for waste management strategies. Minimising waste generation through avoidance or reuse has the potential to reduce costs to business and the community, either by reducing materials used or by reducing the amount of waste to be disposed of, so that the cost of waste management for business is also decreased.

Changes in design and technological advances can create new products and processes which can have benefits at the production stage rather than the resource recovery stage of the supply chain. The proposal for the continuation of the National Packaging Covenant includes a focus on design of packaging materials to contribute to managing a product throughout its life-cycle, including improving its capacity to be reused or disassembled for recovery at end of life. Sustainable design principles are proposed to be included in the revised Environmental Code of practice for Packaging which is incorporated into the Covenant.

This approach aims to put the focus on the design stage and develop products which are more sustainable, energy efficient, avoid the use of hazardous materials and which can be easily reused or recycled. The national waste policy should take a life-cycle approach to product design that seeks to avoid waste through improvements in design, production processes and transport.

Recommendation

The national waste policy should take a life-cycle approach to waste management that seeks to avoid waste through improvements in design, production processes and transport.

1.8 NATIONAL WASTE WATER MANAGEMENT STRATEGY

Water availability for food production and processing is a critical issue following the effects of a continuing drought and low storage levels in many of the country's rivers and dams. Various levels of Australia's governments are responding to the water shortage by developing strategies for the more efficient and effective use of available water to ensure the sustainability of Australia's industries. The issue of waste water treatment and efficiency including the contentious issue of water recycling and re-use of water in the food supply chain remains a critical issue going forward for the wider Australian population but more specifically for the associated sectors particularly the food sector. Current food and water regulations and guidelines recommend a non-prescriptive risk management approach to ensure the safety of water re-use practices during food processing.

There is arguably sufficient technological capacity in the food processing industry to assess and implement simple water efficiency programs at existing plants. Standard frameworks exist for assessing water, energy and waste and these can be readily adapted to food processing. The initial opportunities for recycling and improved water efficiencies can arise from simple operational changes. It is this "low hanging fruit" that yields the greatest cost savings. Many of these operational changes can be assisted by a range of state government based policies and programs such as Every Drop Counts (NSW), Eco Biz (Qld) and Sustainability Victoria initiatives. A number of companies continue to implement changes that address the demand for water at the manufacturing gate.

Notwithstanding these issues the industry seeks a nationally coordinated approach to water security, waste water management and availability for food production, processing and manufacturing. A national approach to waste water management taking advantage of the innovation within industry in relation to improved water efficiency and associated reductions in water demand across the industry and to document some of the more relevant case studies would be valuable and provide direction for the long term sustainability for the industry. More specifically however the approach should take a wider policy perspective to look beyond the specific company driven initiatives of reducing water demand at a particular site or plant and look at responding to the waste water policy debate around the higher level industry issue of water availability, security and re-use and look at where the

opportunities and challenges are for a broader supply chain wide approach to increasing water efficiency in the food and grocery sector.

Recommendation

That the Government include in the national waste policy agenda a more proactive policy approach to the issue of waste water treatment, including the issues of water availability, security and reuse.

AFGC MEMBERS LIST

Arnott's Biscuits Limited
Snack Foods Limited
The Kettle Chip Company Pty Ltd
Asia-Pacific Blending Corporation Pty Ltd
Barilla Australia Pty Ltd
Beak & Johnston Pty Ltd
BOC Gases Australia Limited
Bronte Industries Pty Ltd
Bulla Dairy Foods
Bundaberg Brewed Drinks Pty Ltd
Bundaberg Sugar Limited
Cadbury Schweppes Asia Pacific
Campbell's Soup Australia
Cantarella Bros Pty Ltd
Cerebos (Australia) Limited
Christie Tea Pty Ltd
Clorox Australia Pty Ltd
Coca-Cola Amatil (Aust) Limited
SPC Armona Operations Limited
Coca-Cola South Pacific Pty Ltd
Colgate-Palmolive Pty Ltd
Coopers Brewery Limited
Dairy Farmers Group
Danisco Australia Pty Ltd
Devro Pty Ltd
DSM Food Specialties Australia Pty Ltd
DSM Nutritional Products
Earlee Products
Ferrero Australia
Fibrisol Services Australia Pty Ltd
Fonterra Brands (Australia) Pty Ltd
Foster's Group Limited
Fruco Beverages (Australia)
General Mills Australia Pty Ltd
George Weston Foods Limited
AB Food and Beverages Australia
AB Mauri
Cereform/Serrol
Don
GWF Baking Division
George Weston Technologies
Jasol
Weston Cereal Industries
GlaxoSmithKline Consumer Healthcare
Golden Circle Limited
Goodman Fielder Limited
Meadow Lea Australia
Quality Bakers Aust Pty Ltd
H J Heinz Company Australia Limited
Hans Continental Smallgoods Pty Ltd
Harvest FreshCuts Pty Ltd
Hoyt Food Manufacturing Industries Pty Ltd

Johnson & Johnson Pacific Pty Ltd
Pfizer Consumer Health
Kellogg (Australia) Pty Ltd
Day Dawn Pty Ltd
Specialty Cereals Pty Ltd
Kikkoman
Kimberly-Clark Australia Pty Ltd
Kerry Ingredients Australia Pty Ltd
Kraft Foods Asia Pacific
Lion Nathan Limited
Madura Tea Estates
Manildra Harwood Sugars
Mars Australia
Mars Food
Mars Petcare
Mars Snackfood
McCain Foods (Aust) Pty Ltd
McCormick Foods Aust. Pty Ltd
Merino Pty Ltd
Merisant Manufacturing Aust. Pty Ltd
National Foods Limited
Nerada Tea Pty Ltd
Nestlé Australia Limited
Nestlé Foods & Beverages
Nestlé Confectionery
Nestlé Ice Cream
Nestlé Nutrition
Foodservice & Industrial Division
Novartis Consumer Health Australasia
Nutricia Australia Pty Ltd
Ocean Spray International Inc
Parmalat Australia Limited
Patties Foods Pty Ltd
Peanut Company of Aust. Limited
Procter & Gamble Australia Pty Ltd
Gillette Australia
PZ Cussons Australia Pty Ltd
Queen Fine Foods Pty Ltd
Reckitt Benckiser (Aust) Pty Ltd
Ridley Corporation Limited
Cheetham Salt Limited
Sanitarium Health Food Company
Sara Lee Australia
Sara Lee Foodservice
Sara Lee Food and Beverage
SCA Hygiene Australasia
Sensient Technologies
Simplot Australia Pty Ltd
Spicemasters of Australia Pty Ltd
Stuart Alexander & Co Pty Ltd
Sugar Australia Pty Ltd
SunRice

Swift Australia Pty Ltd
Symrise Pty Ltd
Tate & Lyle ANZ
The Smith's Snackfood Co.
The Wrigley Company
Unilever Australasia
Wyeth Australia Pty Ltd
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Food Science Australia
Foodbank Australia Limited
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Legal Finesse
Linfox Australia Pty Ltd
Meat and Livestock Australia Limited
Monsanto Australia Limited
Promax Applications Group Pty Ltd
Sue Akeroyd & Associates
Swisslog Australia Pty Ltd
The Nielsen Company
Touchstone Cons. Australia Pty Ltd
Visy Pak
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PSF members

Amcors Fibre Packaging
Bundaberg Brewed Drinks Pty Ltd
Cadbury Schweppes Asia Pacific
Coca-Cola Amatil (Aust) Limited
Foster's Group Limited
Golden Circle Limited
Lion Nathan Limited
Owens Illinois
Visy Pak

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