



AUSTRALIAN
FOOD AND GROCERY
COUNCIL

PUBLIC SUBMISSION TO

Australian Competition and Consumer Commission

IN RESPONSE TO

Inquiry into grocery prices

BY

AUSTRALIAN FOOD AND GROCERY COUNCIL

11 March 2008

1 EXECUTIVE SUMMARY

The Australian Food and Grocery Council is the peak national organisation representing Australia's packaged food, drink and grocery products 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 highly processed food, beverage and grocery products sectors.

For most AFGC member companies, sales of packaged food and grocery products to grocery wholesalers and retailers account for the majority of their sales. To a varying degree, member companies also sell products to customers in foodservice, hospitality, convenience, institutional and commercial markets, which may or may not compete directly with grocery retailers for sales to consumers. AFGC members are themselves significant purchasers of fresh and other ingredients, packaging materials, transport and other services.

A feature of the last ten years for both the supply and retail sectors is the ongoing process of rationalisation through mergers, acquisitions or internal restructure. The driving forces for this activity have been to realise scale economies and efficiencies, better brand management, range extension for some suppliers and supply chain efficiency for the major retailers.

The last ten years has also seen increasing reliance on price and even lower price promotions as the point of competitive differentiation among retailers and wholesalers. The low prices of frequently promoted products, at times emanating from the retailers themselves, may become the norm for consumers and reduce average sales values. The arrival of Aldi in the market has increased the pressure on prices and strengthened the use of retailer private label products in delivering lower prices.

At the same time, the pursuit of efficiency through supply chain transformation has involved large investments by the integrated retailers and impacted on costs and efficiency for participants in the supply chain. Drought, storms and high international commodity prices have also been significant influences in the period.

The extent to which any of these factors have contributed to price movements in recent years will only become apparent from the detailed information which may be available to the Commission.

Changes in the Australian food and grocery sector have placed continuous pressure on food and grocery suppliers to improve efficiencies and maintain the profitability of their businesses. Undoubtedly the market power of the retailers and wholesalers has increased, in a market among the most concentrated in the world. As a result, there is substantial and increasing buying power of retailers and wholesalers in the Australian grocery sector. Suppliers seeking to have competitive economies of scale must have a business relationship with all major retailers and wholesalers.

The relationship between retailers and wholesalers and their packaged product suppliers has matured and is now based largely on trading terms built around business plans which recognise the mutual commercial goals of trading partners and the efficiencies inherent in

individual trading relationships. Such terms – like terms for like performance - acknowledge that all retail and wholesale customers are of sufficient scale and influence for suppliers to provide all customers with an equal opportunity to make purchase decisions in a sound, transparent manner – though a manner inextricably linked to agreed performance and business goals.

Given the buying power of customers, business plan based trading relationships cannot protect suppliers entirely from the pressures of those customers. This is the nature of negotiations between parties of unequal strength.

In such a competitive market where prices are highly visible, consumers are well placed to take advantage of price differences and alternative product sources. Protection for consumers, and participants in the supply chain, in such markets depends on the application of modern competition law. The AFGC is unaware of behaviour between trading partners which contravenes the provisions of the Trade Practices Act or for which amendments to the Act would improve the competitiveness of the system.

The AFGC concludes, therefore, that a competitive food and grocery retail sector exists in Australia and operates to deliver competitive prices for the consumer.

2. THE AFGC AND THE AUSTRALIAN GROCERY SUPPLY INDUSTRY

2.1 Australian Food and Grocery Council

The Australian Food and Grocery Council is the peak national organisation representing Australia's packaged food, drink and grocery products 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 highly 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 Australia's food, drink and grocery products industry is 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 processed food 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 and to promote the industry and the virtues of its products, enabling member companies to grow their businesses.

The Council advocates on 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.

2.2 Products and their distribution

The range of products supplied by member companies includes all of the product categories identified by the Commission as falling within the scope of the inquiry. However categories such as fresh meat, fresh fruit and vegetables, dairy products, bakery products and delicatessen items contain very significant volumes of bulk and unpackaged products.

For most AFGC member companies, sales of packaged food and grocery products to grocery wholesalers and retailers account for the majority of their sales. To a varying degree, member companies also sell products to customers in foodservice, hospitality, convenience, institutional and commercial markets, which may or may not compete directly with grocery retailers for sales to consumers. On the other hand, specialty retailers in categories such as fruit and vegetables, bakery and dairy products provide direct competition for relevant packaged products.

AFGC members are themselves significant purchasers of fresh and other ingredients, packaging materials, transport and other services.

The grocery supply industry, in Australia and in many other countries, consists of large international companies and local companies of varying size. Companies tend to concentrate on particular product categories. They do so to achieve economies of scale and competitiveness in the development, manufacture, marketing and distribution of their products and to counter the strength of their retail customers in those markets. The international nature of the industry and of its products means that for everything other than short life products, it is exposed to imported competition and loss of market share if it becomes less price competitive. Even for the fresh, short life products, the prices of many raw materials are determined on world markets.

2.3 Participation in the Inquiry

In this submission, the AFGC concentrates on the relationship between members and their retail or wholesale customers and then only in general terms. The sensitive nature of some of the information sought by the Commission means that it can only be provided by member companies themselves and then only under strict confidentiality. The AFGC has, however, sought to provide information relevant to the processing link in the grocery supply chain and to assist the Commission where it can.

The inquiry covers pricing issues which were the subject of earlier Commission inquiries into the Proposed Sale of Franklins and in response to the Senate Order on prices paid to grocery suppliers. Much of the AFGC evidence to those inquiries remains relevant and is reflected in this submission.

3. CHANGES IN THE INDUSTRY AND RETAIL STRUCTURE

A feature of the last ten years for both the supply and retail sectors is the ongoing process of rationalisation through mergers, acquisitions or internal restructure. The driving forces for this activity have been to realise scale economies and efficiencies, better brand management, range extension for some suppliers and supply chain efficiency for the major retailers.

For suppliers, the changes have included:

- the consolidation and re-equipment of plants to replace small less economic operations,
- greater reliance on and extension of leading brands
- the merging of complementary businesses, and
- cost efficiencies of new offshore plants in countries such as China, Asia and Spain.

For the wholesale and retail sector, the changes of greatest significance for suppliers have been:

- the sale of both the Franklins and Foodland operations and the consequent growth in scale of Woolworths and Metcash,
- the acquisition of Coles by Wesfarmers again with scale benefits,
- the entry of Aldi, a low cost, integrated, international discount retailer, which has increased price competition in all of the categories in which it operates and provided an additional source of staple grocery products for consumers,
- the growth in the number of products for which more and improved retailer brand products have been developed to compete directly with branded products, both for shelf space and sales,
- the increased and very public reliance on price differentiation, reinforced by promotions of leading brands at even lower prices, as the focus of competition throughout the grocery retail market. The nature and level of the price offer may at times emanate from the retailers themselves. For frequently promoted products, the promotion price may become the norm for consumers,

- the ongoing comprehensive supply chain transformations of both Woolworths and Coles which have involved large investments for the retailers with the objective of achieving just in time delivery, reduced inventory and increased efficiency. The process continues to have cost and other implications for suppliers, particularly for their primary freight activities, inventory holdings, shelf ready packaging and B2B data exchange.

There has also been change in the supply of inputs to the grocery industry, including:

- improved varieties of agricultural inputs
- more efficient long term supply arrangements
- external factors influencing the prices of agricultural inputs, such as drought and severe storms
- fertiliser and chemical costs alone having doubled in the past twelve months and predicted to do so again in the next twelve months
- growth of demand in developing countries
- the global ethanol driven demand for grains and other bio-fuel sources, and
- higher oil prices particularly affecting oil based non food products.

The resultant input price increases have undoubtedly contributed to the price movements which prompted this inquiry.

The AFGC has not attempted to analyse the recorded price movements for food and other grocery products beyond the comments in the previous paragraph. We are aware, however, of an analysis carried out by CommSec in October 2007 and refer the Commission to it ⁽¹⁾. It goes beyond price movements to look at affordability over the period from 2001 to 2007. It also comments on the drought induced price movements in fruit and vegetables and the effect of oil prices on non food products, while noting that particular packaged products have become substantially more affordable. Earlier data on factors influencing food price movements is contained in “Price Determination in the Australian Food Industry: A Report” 2004.

Changes in the Australian food and grocery sector have placed continuous pressure on food and grocery suppliers to improve efficiencies and maintain the profitability of their businesses. Undoubtedly the market power of the retailers and wholesalers has increased, in a market among the most concentrated in the world. As a result, there is substantial and increasing buying power of retailers and wholesalers in the Australian grocery sector. Suppliers seeking to have competitive economies of scale must have a business relationship with all major retailers and wholesalers.

While not of direct relevance for this inquiry, Woolworths’ move into the New Zealand market has increased its buying power for goods from suppliers who service both markets from Australia.

(1) “Economic Insights” – Craig James, Chief Equities Economist, CommSec
(02) 9312 0265. Publication 31 October 07.

4. THE PRICING OF PACKAGED GROCERY PRODUCTS

4.1 Trading Terms and the Business Plan Approach

The Commission has identified the buying power of retailers and wholesalers and the implication of that power for retail grocery prices as major issues for the inquiry. The Commission also seeks information on differences in retailer and wholesaler buying power which may translate to purchases from suppliers at lower prices or on better terms. This information will only be obtainable from the submissions of individual trading partners.

In its 2001 submission to the Commission's inquiry in response to the Senate Order on prices paid in the Australian grocery industry, the AFGC provided evidence on the relationship between suppliers and their customers. The bases of the relationships are the trading terms between wholesale and retail trading partners.

The Commission will appreciate that trading terms vary between partners and cover many components which derive from considerations of volume, efficiency, business growth and strategy, and irregularly occurring or one-off business decisions. Some components are fixed values, others variable sums designed to stimulate demand and sales to reach agreed business targets or other market outcomes. Different customers, depending on their operational modes or business strategy, require tailored approaches which may result in differing proportions of overall support. This is simply recognition of the differences between customers and the commercial drivers for suppliers.

Trading terms therefore can be clearly said to be a 'contractual' negotiation between trading partners, based on historical actions and future opportunities that revolve around the commercial return for both parties.

Commonly today, trading terms reflect an approach that recognises the mutual business goals of the parties known as a 'Business Plan' approach. Business plans seek to build a trading relationship more focused on mutual business efficiencies and growth and have largely replaced the traditional price list less discounts approach. While many of the factors embodied in previous discounts remain in negotiations, they are bundled in the business plan and remove the need for ongoing separation and accounting at the individual item level. Business plans allow activities and goals that are regularly undertaken to be mutually recognised on a 'value offered for value received' basis. Non-transaction based activities can also be recognised for the value they provide the trading relationship.

As a result, where efficiencies can be offered and business objectives met, a simple recognition mechanism exists in the marketplace, allowing focus to remain on more fundamental business building priorities.

The approach reflects a maturing of trading relationships and recognition that the ultimate customer, the consumer, can be best served through trading partners expending joint energies focused on meeting consumer needs. It is also a belated recognition of the ongoing and symbiotic nature of an industry where trading relationships, through the brands of both the supplier and retailer stores, continue well beyond the horizon of the parties involved in daily operations.

The business plan approach is therefore a much more commercially orientated approach to the provision of funding support to retailers and wholesalers. It has the additional

advantage of being more specifically tailored to the mutual business goals of trading partners and the efficiencies inherent in individual trading relationships.

A very different relationship exists between suppliers and retailers for retailer branded or private label products. This class of product has received increased attention in recent years with the arrival of Aldi in Australia and the success of the Tesco model in the UK, in which private label plays a prominent part. With only a few exceptions, Aldi's entire food and grocery range comprises private label products, which are sold at (and presumably purchased for) competitively low prices. Industry surveys suggest that suppliers to Aldi value the simplicity and transparency of the Aldi model. Other retailers have revamped their private label offerings to include low priced generic products and higher priced premium products, following the Tesco approach.

The Commission has drawn particular attention to slotting fees, the extent of such fees and their effect on competition. The AFGC understands that such fees are common with retailers elsewhere in the world and reflect the competitive importance of particular in-store locations. Such fees are likely to be higher for new products as retailers seek higher margins to cover additional costs and risks, but in so doing, they may well be an impediment to innovation or lead to the delisting of lower margin products. They are accordingly likely to be part of performance based business plans, as individual suppliers may advise.

Slotting fees also reflect the power of retailers to control what products are on their shelves and where. It is a reality that retailers have reduced the number of products or product variants in particular categories in recent years as they seek to minimise supply chain and administration costs and accommodate new private label (and other) products. The limitations on the exercise of such power are the strength of the brands and the reaction of consumers who can and do go elsewhere if their preferred brand is no longer available.

4.2 “Like Terms for Like Performance”

The Commission has specifically addressed the issue of buying power in grocery supply markets and has sought information to ascertain whether large retailers or wholesalers ‘are able to acquire products from suppliers at lower prices or on better terms than smaller wholesalers or retailers’. This issue was discussed extensively in the Commission's report to the Senate where the conflicting views of smaller wholesalers and independent retailers on the one hand and larger retailers, suppliers and the AFGC were observed without conclusion. The Commission concluded however that there was no anti-competitive behaviour evident from the limited evidence at that inquiry.

The degree of concentration and buying power in the Australian market was noted above. It is also noteworthy that all of the retailers and wholesalers are vigorous and effective competitors and customers of significant scale and influence to grocery suppliers.

This is not to suggest that one or more of the businesses mentioned may not hold more scale or influence than another – that would ignore commercial fundamentals relating to the absolute impact on each supplier's business – but that each customer will have a significant and ongoing relationship with suppliers which neither party can ignore. In a market where all customers can be said to achieve scale, such scale will largely direct price convergence over price difference as all customers are able to negotiate ‘best terms

and prices' from their suppliers and subsequently compete to position their outlets and retail brands to the consumer.

Irrespective of scale, the most successful businesses, be they supplier, wholesaler or retailer, will be those that collaborate and utilise their respective trading relationships to provide offerings most desired by the consumer.

The AFGC remains of the view that trading terms which reflect performance – like terms for like performance - rather than a simplistic measure of scale – like terms for like customers - are appropriate for a retail sector organised as it is in Australia primarily with three vertically integrated retailers and an independent wholesaler supplying many independent retailers. The increasing reliance by suppliers and their customers on the business plan approach to trading terms is consistent with this view.

Vertically integrated retailers and independents will have their own views but the former appear to have some advantages in meeting performance objectives.

A vertically integrated retailer has the ability to take or to forgo profit at points within its extended supply chain, culminating in a retail price at store level set to achieve desired levels of return. A non-integrated retail value chain i.e. separate ownership and profit points within the chain, must take profit for shareholders and stakeholders at each link in the chain.

The implications of such differences in relation to trading arrangements are equally apparent. The vertically integrated retailer accrues to its cost structure any discount, rebate allowance or efficiency dividend no matter where it occurs in the value chain. A non-integrated operation does not. A non-integrated operation will be required to pass on components of trading arrangements through to the stakeholders involved in their value chain.

In addition, where so organised, integrated retailers are able to make commitments and agreements with regard to activities and behaviours that drive efficiencies and/or are business building in their nature. This could encompass activities prior to the purchase of goods (eg. forward order forecasts) through to presentation of products on a retail shelf and increasingly includes supply chain activities previously the responsibility of suppliers and their contractors. Such commitments, whilst theoretically possible within a non-integrated retail operation, will most often need to be undertaken at various decision points, eg. warehouse buying, retail banner group and store level, and therefore be subject to potentially differing views and resultant co-ordination difficulties.

Whilst critical of the 'like terms for like customers' concept, the AFGC's comments should not be interpreted as positioning the grocery wholesale sector as less efficient or less deserving of the level of support received by an integrated retailer.

On the contrary, our support for the concept of 'like terms for like performance' encourages equal opportunity for all parties in the marketplace in a fair, equitable and transparent manner – though a manner inextricably linked to agreed performance and mutual business goals.

The AFGC believes this to be the basis upon which member companies are increasingly improving their trading relationship with all sectors of the Australian grocery industry.

4.3 Input pricing

There is little doubt that the increase in buying power of retailers and wholesalers has had an impact along the supply chain and has increased the pressure on packaged product suppliers to reduce costs and improve efficiency. This pressure flows to the suppliers of raw materials and services for those products.

An example of this pressure was in the supply of bottled fresh milk. The move by retailers to private label milk in 2000 led to a pronounced decline in milk prices for processors and farmers, a decline which was clearly visible in CPI figures at the time. The four quarters from December 2000 registered year on year price reductions of up to 5.2 per cent for milk while the CPI for food recorded increases between 3.5 and 6.6 per cent in the same period.

Packaged product manufacturers have sought to respond to buying pressure by working with their growers or input suppliers to build long term relationships, reduce costs and improve efficiency. Such relationships allow the trading partners a better opportunity to counter short term or external price distortions. For some products, however, the ultimate response has been to source materials and/or products offshore.

As noted earlier, integrated retailers have impacted the supply of transport and packaging inputs through their extended supply chain transformation projects. By taking control of certain transport tasks and diverting supplies to new national warehouses as they progressively come online, retailers have in some cases imposed higher transport costs on suppliers. Shelf ready packaging requirements from retailers also add to supplier costs. The benefits of these initiatives in terms of reduced costs or increased sales have in many cases not been apparent.

5. CONCLUSION

This inquiry is in response in part to data which points to food and grocery prices increasing at a rate higher than the headline inflation rate. The AFGC has identified external factors which have impacted the price of many agricultural and oil based products. We have also noted a number of significant developments and major investments over the last decade or so which have changed the operations of retailers, wholesalers and suppliers and which may have had varying effects on costs and prices. The extent to which any of these factors have contributed to price movements in recent years will only become apparent from the detailed information which may be available to the Commission.

The last decade has been a period of rapid change for the Australian food and grocery sector which has confirmed the highly concentrated nature of the wholesale and retail sector. The increased vertical integration of the two major retailers, the growth of the wholesale sector and the arrival of Aldi confirm the strength of the market.

Suppliers have borne the brunt of competition in the market based very heavily on consistently low prices, reinforced by regular discounted price promotions which have further reduced consumer expectations and average sales revenues. The increased role of private label in the marketing strategy of retailers and wholesalers, in competition with branded products, has provided consumers with additional low price purchase options.

The inescapable conclusion is that the buying power of retailers and wholesalers has increased substantially in recent years and is intense. While there are substantial scale differences between customers in the market, all are vigorous competitors and of significant scale and influence.

In this environment, the AFGC and its members consider that business plan based trading terms which recognise performance and mutual objectives are the most appropriate on which to build a relationship with their customers. Such terms provide all customers with an opportunity to make purchase decisions on a sound commercial basis.

Given the buying power of customers, business plan based trading relationships cannot protect suppliers entirely from the pressures of those customers. This is the nature of negotiations between parties of unequal strength.

In such a competitive market where prices are highly visible, consumers are well placed to take advantage of price differences and alternative product sources. Protection for consumers, and participants in the supply chain, in such markets depends on the application of modern competition law. The AFGC is unaware of behaviour between trading partners which contravenes the provisions of the Trade Practices Act or for which amendments to the Act would improve the competitiveness of the system.

The AFGC concludes, therefore, that a competitive food and grocery retail sector exists in Australia and operates to deliver competitive prices for the consumer.

AFGC MEMBERS AS AT 21 FEBRUARY 2008

AAB Holdings Pty Ltd
 Arnott's Biscuits Ltd
 Snack Foods Ltd
 The Kettle Chip Company Pty Ltd
 Asia-Pacific Blending Corporation Pty Ltd
 Barilla Australia Pty Ltd
 Beak & Johnston Pty Ltd
 BOC Gases Australia Ltd
 Bronte Industries Pty Ltd
 Bulla Dairy Foods
 Bundaberg Brewed Drinks Pty Ltd
 Bundaberg Sugar Ltd
 Cadbury Schweppes Asia Pacific
 Campbell's Soup Australia
 Cantarella Bros Pty Ltd
 Cerebos (Australia) Ltd
 Christie Tea Pty Ltd
 Clorox Australia Pty Ltd
 Coca-Cola Amatil (Aust) Ltd
 SPC Ardmona Operations Ltd
 Colgate-Palmolive Pty Ltd
 Coopers Brewery Ltd
 Dairy Farmers Group
 Danisco Australia Pty Ltd
 Devro Pty Ltd
 Dole Australia
 DSM Food Specialties Australia Pty Ltd
 DSM Nutritional Products
 Earlee Products
 Ferrero Australia Pty Ltd
 Fibrisol Services Australia Pty Ltd
 Fonterra Brands (Australia) Pty Ltd
 Foster's Group Limited
 Frucor Beverages (Australia)
 General Mills Australia Pty Ltd
 George Weston Foods Ltd
 AB Food and Beverages Australia
 AB Mauri
 Cereform/Serrol
 GWF Baking Division
 GWF Meat & Dairy Division
 George Weston Technologies
 Jasol
 Weston Cereal Industries
 GlaxoSmithKline Consumer Healthcare
 Golden Circle Ltd
 Goodman Fielder Limited
 Meadow Lea Australia
 Quality Bakers Aust P/L
 H J Heinz Company Australia Ltd
 Hans Continental Smallgoods Pty Ltd
 Harvest FreshCuts Pty Ltd
 Heimann Foodmaker Group
 Hoyt Food Manufacturing Industries Pty Ltd
 J Boag and Son Brewing Ltd
 Johnson & Johnson Pacific Pty Ltd
 Pfizer Consumer Health
 Kellogg (Australia) Pty Ltd
 Day Dawn 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 Australia Pty Ltd
 Merino Pty Ltd
 Merisant Manufacturing Aust. Pty Ltd
 National Foods Ltd
 Nerada Tea Pty Ltd
 Nestlé Australia Ltd
 Nestlé Foods & Beverages
 Nestlé Confectionery
 Nestlé Ice Cream
 Nestlé Chilled Dairy
 Nestlé Nutrition
 Foodservice & Industrial Division
 Novartis Consumer Health
 Australasia Pty Ltd
 Nutricia Australia Pty Ltd
 Ocean Spray International, Inc
 Parmalat Australia Ltd
 Patties Foods Pty Ltd
 Peanut Company of Aust Ltd
 Procter & Gamble Australia Pty Ltd
 Gillette Australia
 PZ Cussons Australia Pty Ltd
 Quality Ingredients Ltd
 Prima Herbs and Spices
 Reckitt Benckiser (Aust) Pty Ltd
 Ridley Corporation Ltd
 Cheetham Salt Limited
 Sanitarium Health Food Company
 Sara Lee Australia
 Sara Lee Foodservice
 Sara Lee Food and Beverage
 SCA Hygiene Australasia
 Schwarzkopf and Henkel
 Sensient Technologies
 Simplot Australia Pty Ltd
 Specialty Cereals Pty Ltd
 Spicemasters of Australia Pty Ltd
 Stuart Alexander & Co Pty Limited
 Sugar Australia Pty Ltd
 SunRice
 Swift Australia Pty Ltd
 Symrise Pty Ltd
 Tate & Lyle ANZ
 The Smith's Snackfood Co.
 Unilever Australasia
 Waters Trading Pty Ltd
 Wyeth Australia Pty Ltd
 Yakult Australia Pty Ltd

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 Australia Pork Limited
 ACI Operations Pty Ltd
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 Linfox Australia Pty Ltd
 Meat and Livestock Australia Ltd
 Monsanto Australia Ltd
 PricewaterhouseCoopers
 Promax Applications Group Pty Ltd
 Sue Akeroyd & Associates
 Swire Cold Storage
 Swisslog Australia Pty Limited
 Touchstone Cons. Aust Pty Ltd
 Visy Pak
 Wiley & Co Pty Ltd

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