

Australian Food and Grocery Council

SUBMISSION

OCTOBER 2011

TO:
SENATE ECONOMICS LEGISLATION COMMITTEE

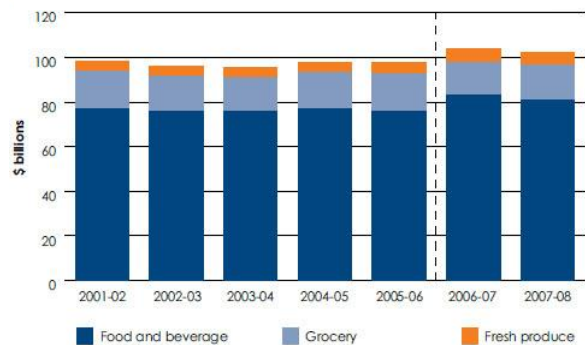
IN RESPONSE TO:
**INQUIRY INTO CONSTITUTIONAL CORPORATIONS (FARM GATE TO
PLATE) BILL 2011**



The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry. Membership of AFGC comprises more than 150 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors. (A full list of members is included in Appendix A).

AFGC's aim is for the Australian food, beverage and grocery manufacturing industry to be world-class, sustainable, socially-responsible and competing profitably domestically and overseas. With an annual turnover of \$102 billion (Figure 1), Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity.

Figure 1. Industries turnover (\$2007-8)



Source: ABS, catalogue number 8221.0 and 8159.0⁶

Manufacturing of food, beverages and groceries in the fast moving consumer goods sector¹ is Australia's largest and most important manufacturing industry, four times larger than the automotive parts sector – the food and grocery manufacturing industry is a vital contributor to the wealth and health of our nation. Representing 28 per cent of total manufacturing turnover, the sector is comparable in size to the Australian mining sector and is more than four times larger than the automotive sector. The industry's products are in more than 24 million meals, consumed by 22 million Australians every day, every week and every year. The food and grocery manufacturing sector employs more than 288,000 people representing about 3 per cent of all employed people in Australia paying around \$13 billion a year in salaries and wages.

The growing and sustainable industry is made up of 38,000 businesses and accounts for \$44 billion of the nation's international trade. The industry's total sales and service income in 2007-08 was \$102 billion and value-added increased to nearly \$27 billion². The industry spends about \$3.8 billion a year on capital investment and over \$500 million a year on research and development. Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost half of the total persons employed being in rural and regional Australia³.

It is essential for the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

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

² AFGC and KMPG. *State of the Industry 2010*. Essential information: facts and figures. Australian Food and Grocery Council. Oct 2010.

³ About Australia: www.dfat.gov.au

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EXECUTIVE SUMMARY

The Australian Food and Grocery Council (AFGC) welcomes the opportunity to make this submission to the Economics Legislation Committee inquiry into the *Constitutional Corporations (Farm Gate to Plate) Bill 2011* (“the Bill”).

AFGC supports the sentiment of providing to consumers transparency in pricing arrangements between suppliers of produce to the large retail supermarket chains. AFGC cannot, however, support the Bill for reasons of practicality and cost.

Consumers are used to assessing the fairness of retail prices based on their own experience, appreciation of product quality and affordability. This is in sharp contrast to their ability to ascertain whether farm gate prices are fair and equitable as consumers have little or no appreciation of the complexity of the supply chain and the variability of the costs associated with supply chain operations from category to category, location to location and from one part of the year to the next.

Farm gate pricing is therefore, poorly suited to providing consumers the information they need to select fresh produce which not only appears to give farmers a fair return, but in reality does provide a fair return to farmers based on their costs of production, and additional fair costs of bringing the produce to the supermarket.

AFGC shares, however, the concerns that asymmetry in the market power of large supermarket chains and their suppliers coupled with the aggressive retail pricing of the major market players and the aggressive trading terms they extract is squeezing the margins of businesses up the supply chain and threatening their viability. Food manufacturers are being forced to shut business, or relocate off shore which in turn is disadvantaging their regular, long terms suppliers of fresh produce.

To address this market power imbalance AFGC proposes that the Government establish a **Supermarket Fair Trading Code of Conduct and a Supermarket Ombudsman** charged with ensuring fairness in trading term negotiations along the supply chain and providing a mechanism to resolve disputes regarding trading practices.

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RECOMMENDATIONS

AFGC recommends that:

1. The *Constitutional Corporations (Farm Gate to Plate) Bill 2011* be opposed as consumers will be unable to assess farm gate prices in the context of retail prices due to the complex and variable costs within the supply chain; and fresh produce producers will also fail to benefit as market signals will be confused.
2. The Economics Legislation Committee note that aggressive retail pricing and trading practices by supermarkets have the potential to shut down Australian food manufacturing operations which in turn, can damage the businesses of horticultural producers also, as manufacturers are substantial buyers of fresh produce.
3. The Economics Legislation Committee note that costs associated with the display of farm gate pricing will most likely be passed up the supply chain by supermarkets to suppliers further squeezing their margins.
4. The Government establish a Supermarket Fair Trading Code of Conduct and a Supermarket Ombudsman charged with ensuring fairness in trading term negotiations along the supply chain and providing a mechanism to resolve disputes regarding trading practices.

1. INTRODUCTION

The Australian Food and Grocery Council (AFGC) welcomes the opportunity to make this submission to the Economics Legislation Committee inquiry into the *Constitutional Corporations (Farm Gate to Plate) Bill 2011* (“the Bill”).

Recent aggressive pricing by supermarkets has led to debate in the media and in public policy fora about the potential impact on businesses further up the supply chain, including producers of fresh horticultural products. Consumers have become concerned with the potential impact on fresh produce producers with most wanting to pay prices which gives producers a fair return.

AFGC supports the sentiment behind the Bill which, in essence, is to provide to consumers transparency in pricing arrangements between suppliers of produce (i.e. horticultural products) and the large retail supermarket chains. This in turn will give consumers confidence that produce farmers will receive reasonable prices for their produce, and that supermarket prices are fair and equitable.

AFGC cannot, however, support the Bill for reasons of practicality and cost. AFGC proposes, however, that the Government establish a **Supermarket Fair Trading Code of Conduct and a Supermarket Ombudsman** charged with ensuring fairness in trading term negotiations along the supply chain and providing a mechanism to resolve disputes regarding trading practices.

More detail is provided below regarding:

1. practical difficulties preventing consumers from benefiting from farm gate prices display in supermarkets, which will also prevent fresh produce producers from benefiting; and
2. AFGC’s concerns regarding asymmetric market power arising from retail sector concentration and the proposal for the Supermarket Ombudsman to address it.

2. PRACTICAL DIFFICULTIES OF FARM GATE PRICING

2.1. Complexity of the supply chain

The food supply chain is complex. Even within the fresh produce categories it is variable in:

1. length, with some produce sourced locally, but in many cases produce having to cover hundreds if not thousands, of kilometers even within Australia;
2. the number of parties within the supply chain. Supermarkets may deal with a local producer but frequently produce passes through wholesalers and transport companies;
3. the storage and handling conditions – produce is seasonal and may require extended storage in controlled conditions protecting it from extremes of temperature and moisture, and from damage from pests (e.g. rodents, insects, moulds etc.) . Produce may also need to be specially packaged and / or held for ripening depending on the production area and the distance to market;

4. availability and quality of produce – the production of horticultural products in many cases is subject to the vagaries of weather affecting both amount and quality of produce. This in turn directly affects the unit cost of production to the producer.

Produce sold through major supermarket chains is also subject to tight quality specifications with its integrity and safety assured by advanced quality control systems – all of which add costs.

These factors add to the cost of bringing the produce to the supermarket and results in highly variable costs to supermarkets even within product categories. This can be a major source of cost variation for produce within supermarkets both at “chain level” and store level across time periods.

2.2. Consumers are unable to assess farm gate prices.

Consumers assess whether retail prices are fair and reasonable based on their own capacity to pay, their desire for the product and their assessment of its quality. Consumers do this by:

- 1) evaluating the quality of produce based on its appearance, feel and smell;
- 2) making judgments based on their own experience of historic prices and price movements;
- 3) comparing prices with alternative retailers either directly in the store, or through comparison of advertised prices by retailers; and
- 4) other sources of information including word of mouth and news programs regarding unusual price movements (for example the price movement of bananas following hurricane destruction of plantations in Queensland earlier this year).

In contrast to this AFGC considers that most consumers are unable to judge whether retail prices are fair and reasonable with respect to farm gate prices, as they cannot assess farm gate prices against:

1. producers’ production costs and potential profit margins;
2. cost incurred in the supply chain in bringing produce of a specific quality, from a particular producer, in a particular part of the country, at a particular time of year, against the backdrop of particular availability from the industry in generally and potential profit margins of business within the supply chain; and finally
3. the direct costs incurred by supermarkets within the supply chain and stores they control directly and their potential profit margins.

Indeed this information is generally opaque even to the business community so consumers have little chance of either obtaining it, or indeed understanding it.

More importantly perhaps, if farm gate prices were provided, in many cases consumers may judge the retail prices to be unfair and unreasonable, possibly without justification leading their confidence in receiving value for money in purchases to be undermined, and loss of trust in the supply of that particular batch of produce.

Consumers may also not understand the inevitable disconnect between movement in retail prices which may happen from week to week, with the more stable “average” farm gate prices displayed as required by the Bill, again undermining their confidence in the system.

Thus the whole of purpose of the Bill, which is presumably to encourage consumers to buy produce from producers who seem to be getting a “fairer return” will be undermined.

In short therefore AFGC considers there are major impediments to the consumer gaining real benefit from the display in supermarkets of farm gate prices proposed by the Bill. Moreover, fresh produce producers will also fail to benefit as “market signals” from consumer purchasing patterns will probably be confused.

Recommendation

AFGC recommends that the *Constitutional Corporations (Farm Gate to Plate) Bill 2011* (“the Bill”) be opposed as consumers will be unable to assess farm gate prices in the context of retail prices due to the complex and variable costs within the supply chain; and fresh produce producers will also fail to benefit as market signals will be confused.

2.3. Cost of providing the pricing information

The cost of providing the farm gate pricing information will not be insignificant. The pricing data itself will be relatively simple to gather, but some costs will be incurred in verifying the data and subsequently displaying it on supermarket signage. These costs will almost certainly be extracted from the suppliers by the supermarkets, putting further pressure on their margins. With no benefit flowing through to consumers, or producers, it is difficult to judge how the costs of farm gate price labelling can be justified.

Recommendation

AFGC recommends that the Economics Legislation Committee note that costs associated with the display of farm gate pricing will most likely be passed up the supply chain by supermarkets to suppliers further squeezing their margins.

3. RETAIL SECTOR CONCENTRATION

AFGC is extremely concerned regarding the level retail sector concentration and trading practices. Major retailers are pressuring their suppliers to sacrifice margin as they engage in aggressive price competition to win market share. Private label is taking a greater share of sales and retailers are limiting the range of branded food products resulting in product delisting. This environment is particularly difficult for Australian SMEs.

This is against the backdrop of a number of other major factors contributing to the erosion of international competitiveness of the food manufacturing sector including:

- **rising input costs** – raw materials, energy, transport, labour are all going up in concert, with prices establishing a long term upward trend;
- **exchange rate effects** – with a high Australian dollar imported foods are becoming more competitive and exports less competitive putting downward pressure on prices in the domestic market and providing less revenue from export markets; and
- **regulatory compliance costs** - State and Territory, and Commonwealth regulations including food standards, environmental regulations, planning regulations, occupational health and safety

and workplace relations impose a high regulatory burden on industry. The lack of uniformity across jurisdictions in particular creates unnecessary compliance costs.

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

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

- shortages in skilled workers – food companies are reporting difficulty in securing high calibre, technically trained professionals;
- infrastructure bottlenecks – with almost 50% of truck movements on roads carrying food and beverage products substandard traffic flow, particularly in capital cities is becoming a problem;
- declines in innovation support by Governments at state and territory level – the risk / reward balance where Governments acknowledge the broad community benefits of innovation are not being maintained; and
- trade barriers (tariffs and quotas) and bi-lateral agreements between other countries can penalise Australian exporters.

AFGC has long argued that supermarket retailers are putting excessive pressure on their suppliers (both manufacturers and fresh produce suppliers) to support their aggressive price competition in the market place. Whilst arguably benefiting the consumer in the short term, this is punishing food producers and manufacturers who are absorbing a significant amount of the costs associated with these price reductions. Private label is taking a greater share of sales and supermarket shelves with retailers able to contract manufacture anywhere in the world rather than being tied to manufacturing assets in Australia. Retailers are also de-listing branded products to allow for the expansion of private label making it harder for manufacturers to access the market.

The combination of market concentration, substantial growth in private label and restricting brands on shelf provide supermarket retailers with unprecedented power and opportunity to force lower prices from their suppliers – i.e. food manufacturers. This in turn reduces margins. Margin squeeze necessarily means profits are diminished and the returns on investment are eroded. **The ultimate result is that the business case for companies to invest and re-invest in manufacturing in Australia is severely compromised.** This leads to reduced levels of innovation, loss of competitiveness and business closures or relocation offshore.

If food manufacturers utilising horticultural products are forced to close businesses or relocate offshore Australian producers are also disadvantaged through losing buyers of their products.

Recommendation

AFGC recommends that the Economics Legislation Committee note that aggressive retail pricing and trading practices by supermarkets have the potential to shut down Australian food manufacturing operations which in turn, can damage the businesses of horticultural producers also as manufacturers are substantial buyers of horticultural products.

AFGC recognises the difficulty for Government in addressing this issue, particularly against a backdrop where suppliers are unwilling to report anti-competitive behaviour or unfair contract terms. Notwithstanding this, there is precedent for Government to establish regulatory and co-regulatory mechanisms to oversee markets where there is evidence of potential market power abuse (for example, the Horticultural Code of Conduct)⁴

AFGC considers there is a strong case to introduce a co-regulatory Supermarket Fair Trading Code of Conduct overseen by a Supermarket Ombudsman. The Code of Conduct would provide guidance on acceptable approaches of trading terms and contract negotiations. The Ombudsman would be an umpire to assist resolving concerns and help create a level playing field in the highly-concentrated supermarket industry. The Ombudsman would promote fairness along the supply chain and provide recourse for those participants in the food and grocery sector who lack market power, particularly producers and small-to-medium food manufacturers

The Ombudsman should also be supported by retailers as it will provide a mechanism for them to address ongoing concerns regarding asymmetry in market power and concerns stemming from concentration in the retail sector.

3.1. Supermarket Ombudsman – Proposed Arrangements

Key Functions

The primary function of the Supermarket Ombudsman would be to oversee and enforce the Supermarket Fair Trading Code of Conduct. The Ombudsman would have the power to investigate potential breaches of the Code and arbitrate disputes between suppliers and large retailers. Where there is a breach of the Code, the Ombudsman will have the power to name and shame and impose financial penalties.

In addition the Supermarket Ombudsman would provide:

Leadership – the Ombudsman would advocate fair business returns along the supply chain based on equitable risk and reward sharing.

Information Gathering and Reporting – the Ombudsman would gather, collate and subsequently report on supply chain practices as a way of monitoring performance of the supply chain and adherence to acceptable trading terms negotiations and settlement.

⁴ <http://www.accc.gov.au/content/index.phtml/tag/horticulturecode/>

Performance Monitoring – periodic assessment of the effectiveness of the Ombudsman and his office in improving perceived and actual business practices along the supply chain would allow Government and stakeholders to determine whether the Ombudsman system should continue, be modified or abandoned.

Supermarket Fair Trading Code of Conduct

The primary purpose of the Code is to ensure the imbalance in market power which clearly exists along the supply chain does not result in market power abuse. It provides a mechanism for trading terms to be examined against community values and general expectation that, in this day and age, the concept of fairness and a fair go should be a feature of business practices.

The Code would apply to all retailers with an annual turnover of over \$1 billion and it must be incorporated into contracts with suppliers.

The Code would limit large retailers' power to:

- alter supply terms retrospectively unless there is agreement to do so;
- demand suppliers fund promotions such within stores;
- delist products without reasonable notice to suppliers;
- seek reimbursement for theft in distribution centres or stores from suppliers;
- make changes to suppliers' supply chain procedures;
- make suppliers pay certain marketing costs and compensation for waste;
- make suppliers pay retailers for stocking their products; and
- seek reimbursement from suppliers for inaccurate sales forecasting by retailers.

The Code would require retailers to:

- deal fairly and lawfully with suppliers;
- pay suppliers within a reasonable time;
- take care when ordering for promotions; and
- have similar requirements for private label products and branded products with regards to access to shelf space
- respect suppliers right to take complaints to the Ombudsman and not take any retaliatory action against a supplier that places a complaint.

In the long term, AFGC considers this will benefit consumers as Australian producers and manufacturers will be given the capacity to stay competitive ensuring choice, innovation and quality products continue to be available on supermarket shelves.

International Perspectives

In May 2011 the UK Government released a paper to accompany a draft *Groceries Adjudicator Bill* which is published for pre-legislative scrutiny by the UK Parliament. The Bill establishes a Groceries Code Adjudicator to oversee compliance with a Grocery Supply Code of Practice⁵. The proposal follows concerns being raised in the UK similar to those raised in Australia regarding the exercise of buyer power by grocery retailers. More specifically the Commission which examined the issue found that:

“.....when, in the hope of gaining competitive advantage, retailers transfer excessive risks of unexpected cost to their suppliers, this was likely to lessen supplier’s incentives to invest in new capacity, products and production processes, with the potential for detriment to the long term interests of consumers.”

These findings echo the concerns raised in Australia regarding the impact of excessive market power of retailers, as was detailed earlier in this submission. It should be noted that retailer concentration in the UK is significantly less than in Australia.

AFGC considers the UK model has merit.

Recommendation

AFGC recommends that the Government establish a Supermarket Fair Trading Code of Conduct and a Supermarket Ombudsman charged with ensuring fairness in trading term negotiations along the supply chain and providing a mechanism to resolve disputes regarding trading practices.

4. CONCLUSIONS

Australia has the most concentrated supermarket retail sector among developed countries. This has created an asymmetry in market power which coupled to aggressive pricing practices is squeezing margins back up the supply chain. This is undermining the profitability of manufacturing and farming businesses alike, threatening their viability.

Government has a role in rebalancing the market power in the supply chain to ensure that all participants receive fair returns for products and service provided competitively. Simply listing farm gate prices, whilst having a *prime facia* attractiveness is poorly suited to this task. The introduction of a **Supermarket Fair Trading Code of Conduct and a Supermarket Ombudsman promises to be a more effective mechanism.**

⁵ The Government’s Policy for a Groceries Code Adjudicator. UK Government. May 2011

Membership as at 31 JULY 2011

Arnott's Biscuits Limited	Kraft Foods Asia Pacific	*Baking Association Australia
Asia-Pacific Blending Corporation P/L	Laucke Flour Mills	CAS Systems of Australia
Barilla Australia Pty Ltd	Lion Nathan National Foods Limited	CHEP Asia-Pacific
Beak & Johnston Pty Ltd	Madura Tea Estates	CSIRO Food and Nutritional Sciences
Beechworth Honey Pty Ltd	Manildra Harwood Sugars	CoreProcess (Australia) Pty Ltd
Beerenberg Pty Ltd	Mars Australia	*CropLife
Bickfords Australia	McCain Foods (Aust) Pty Ltd	CROSSMARK Asia Pacific
Birch and Waite Foods Pty Ltd	McCormick Foods Aust. Pty Ltd	Dairy Australia
BOC Gases Australia Limited	McDonald's Australia	Food Liaison Pty Ltd
Bronte Industries Pty Ltd	Merisant Manufacturing Aust. Pty Ltd	FoodLegal
Bulla Dairy Foods	Nerada Tea Pty Ltd	*Foodservice Suppliers Ass. Aust.
Bundaberg Brewed Drinks Pty Ltd	Nestlé Australia Limited	*Food industry Association QLD
Bundaberg Sugar Limited	Nutricia Australia Pty Ltd	*Food industry Association WA
Byford Flour Mills T/a Millers Foods	Ocean Spray International Inc	*Food Q
Campbell's Soup Australia	Only Organic 2003 Pty Ltd	Foodbank Australia Limited
Cantarella Bros Pty Ltd	Parmalat Australia Limited	*Go Grains Health & Nutrition Ltd
Cerebos (Australia) Limited	Patties Foods Pty Ltd	Grant Thornton
Cheetham Salt Ltd	Pfizer Consumer Healthcare	GS1
Christie Tea Pty Ltd	Procter & Gamble Australia Pty Ltd	Harris Smith
Church & Dwight (Australia) Pty Ltd	Queen Fine Foods Pty Ltd	IBM Business Cons Svcs
Clorox Australia Pty Ltd	QSR Holdings	innovations & solutions
Coca-Cola Amatil (Aust) Limited	Reckitt Benckiser (Aust) Pty Ltd	KN3W Ideas Pty Ltd
Coca-Cola South Pacific Pty Ltd	Safcol Canning Pty Ltd	KPMG
Colgate-Palmolive Pty Ltd	Sanitarium Health and Wellbeing	Leadership Solutions
Coopers Brewery Limited	Sara Lee Australia	Legal Finesse
Danisco Australia Pty Ltd	SCA Hygiene Australasia	Linfox Australia Pty Ltd
Devro Pty Ltd	Schweppes Australia	Logan Office of Economic Dev.
DSM Food Specialties Australia Pty Ltd	Sensient Technologies	Meat and Livestock Australia Limited
Earlee Products	Simplot Australia Pty Ltd	Monsanto Australia Limited
Eagle Boys Pizza	Spicemasters of Australia Pty Ltd	New Zealand Trade and Enterprise
FPM Cereal Milling Systems Pty Ltd	Stuart Alexander & Co Pty Ltd	*PLMA Australia / New Zealand
Ferrero Australia	Subway	Red Rock Consulting
Fibrisol Services Australia Pty Ltd	Sugar Australia Pty Ltd	RQA Asia Pacific
Fonterra Brands (Australia) Pty Ltd	SunRice	StayinFront Group Australia
Food Spectrum Group	Tasmanian Flour Mills Pty Ltd	Strikeforce Alliance
Foster's Group Limited	Tate & Lyle ANZ	Swire Cold Storage
Frucor Beverages (Australia)	The Smith's Snackfood Co.	Swisslog Australia Pty Ltd
General Mills Australia Pty Ltd	The Wrigley Company	Tetra Pak Marketing Pty Ltd
George Weston Foods Limited	Tixana Pty Ltd	The Food Group Australia
GlaxoSmithKline Consumer Healthcare	Unilever Australasia	The Nielsen Company
Go Natural	Vital Health Foods (Australia) Pty Ltd	Touchstone Cons. Australia Pty Ltd
Goodman Fielder Limited	Ward McKenzie Pty Ltd	Valesco Consulting FZE
Gourmet Food Holdings	Wyeth Australia Pty Ltd	Visy Pak
H J Heinz Company Australia Limited	Yakult Australia Pty Ltd	Wiley & Co Pty Ltd
Harvest FreshCuts Pty Ltd	Yum Restaurants International	
Healthy Snacks		
Hela Schwarz	Associate & *Affiliate Members	PSF Members
Hoyt Food Manufacturing Industries P/L	Accenture	Amcor Packaging Australia
Hungry Jack's Australia	Australian Pork Limited	Bundaberg Brewed Drinks Pty Ltd
Jalna Dairy Foods	ACI Operations Pty Ltd	Schweppes Australia Pty Ltd
JBS Australia Pty Limited	Amcor Fibre Packaging	Coca-Cola Amatil (Aust) Limited
Johnson & Johnson Pacific Pty Ltd	*ASMI	Lion Nathan Limited
Kellogg (Australia) Pty Ltd	AT Kearney	Owens Illinois
Kerry Ingredients Australia Pty Ltd	BRI Australia Pty Ltd	Visy Pak
Kimberly-Clark Australia Pty Ltd	Baker & McKenzie	

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