

Submission No. 54
(Inq into Obesity)
JE 30/05/08



AUSTRALIAN
FOOD AND GROCERY
COUNCIL

SUBMISSION

SUBMISSION TO

House of Representatives Standing Committee on
Health and Ageing

IN RESPONSE TO

Inquiry into Obesity in Australia

30 May 2008

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1 PREFACE

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 3.) 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 business matters, public policy and consumer-related issues on behalf of a dynamic and rapidly changing industry operating in an increasing globalised economy. As global economic and trade developments continue to test the competitiveness of Australian industry, transnational businesses are under increasing pressure to justify Australia as a strategic location for corporate production, irrespective of whether they are Australian or foreign owned. In an increasingly globalised economy, the ability of companies to internationalise their operations is as significant as their ability to trade globally.

Increased trade, rationalisation and consolidation of businesses, increased concentration of ownership among both manufacturers and retailers, intensified competition and dynamic, increasingly complex and demanding consumers are features of the industry across the globe. Moreover, the growing global middle class of consumers is more sophisticated and discerning, driving innovation and differentiation of products and services.

The AFGC is working with governments in taking a proactive, even tactical, approach to public policy to enable businesses to tackle the threats and grasp the dual opportunities of globalisation and changing consumer demands.

2 EXECUTIVE SUMMARY

The Australian Food and Grocery Council (AFGC) welcomes the opportunity to make this submission to the *House of Representatives Standing Committee on Health and Ageing Inquiry into Obesity in Australia* (‘the Inquiry’).

The fundamental cause of individuals becoming overweight is well understood - excess intake is stored as fat. Less well understood are the factors (and their interactions) that lead individuals to consistently eat a little more energy than they need. The consequences, however, of over consumption are substantial for individuals and for the health budget (\$21 million in 2005).

The complexity of the issue has been recognised by Governments in Australia and overseas with programs now in place addressing the many “obesogenic” environmental factors which have been identified – with a focus on providing nutrition information to assist diet choices and promotion of physical activity.

The effectiveness of programs is dependent of the quality of the data which informs them. Information of the nutrition and physical exercise status of Australians from national surveys is dated; although this short coming will be addressed through the imminent release of data from the National Children’s Nutrition and Physical Activity Survey, to be followed within two years by a new National Nutrition Survey which will provide adult data.

The food industry has responded to the recent increases in concern regarding overweight and obesity through a number of valuable initiatives including:

- providing \$1 million of support for the National Children’s Nutrition and Physical Activity Survey conducted in partnership with the Department of Health and Ageing and the Department of Agriculture Fisheries and Forestry;
- introduction of a new, voluntary Daily Intake Guide front of pack labelling scheme providing consumers with information about the energy and nutrient content foods and relating it to dietary needs; and
- committing to responsible advertising consistent with concepts of moderation and the importance of a balanced diet through support of industry advertising codes.

The food industry can provide further value in addressing the overweight and obesity issue through label claims and promotions of products which can assist in weight management. But to do so relaxation of current regulatory prohibitions is required, and introduction of a more enabling regulatory approach which will allow truthful and substantiated health and weight management claims.

Such an approach can be one of number of ways in which the food industry could participate in a National Preventive Health Strategy. The AFGC has advocated to the Rudd Government the willingness of the food industry to participate constructively in preventive health and opportunities exist for the food industry skills in promotion of healthy eating and food technology to be harnessed in effective partnerships.

The AFGC does not support alternatives such as taxes, subsidies or restraints on the sale and promotion of foods based on their levels of fat, sugar or energy.

“Fat taxes” are inequitable and regressive disadvantaging the poorer off the most. Similarly broad based subsidises on food stuffs will benefit sections of the community which don’t need it – the well off and the healthy weight. Furthermore there is no evidence that such price distortions are effective in changing consumption patterns, except at the highest levels of imposition.

The AFGC recognises, however, that highly targeted subsidies on some foods for some very disadvantage groups may be an appropriate response to assist the overweight and obese, as a form of social welfare and to assist clinical interventions.

The AFGC strongly opposes “traffic light” classifications of foods as counter to the concept of health outcomes being based on healthy diets and providing information to consumers which encourages them to select diets according to their individual needs.

3 RECOMMENDATIONS

- The AFGC recommends the Inquiry note the imminent release of the National Children's Nutrition and Physical Activity Survey and the forthcoming National Nutrition Survey and the value of the data they will provide in informing Government policy development to address overweight and obesity. 9
- The AFGC recommends that the Inquiry include a review of the delivery of Commonwealth and State and Territory programs which have been developed and implemented in the last five years to address the overweight and obesity issue. 10
- The AFGC recommends the Inquiry take time to be comprehensively informed by the results of the National Children's Nutrition and Physical Activity Survey which is due for release in mid July 2008. 11
- The AFGC recommends the AFGC DIG scheme be supported by the Inquiry as a superior labelling approach providing valuable information to assist consumers food purchasing and food consumption choices. 12
- The AFGC recommends the Inquiry support a flexible health claims regulatory framework to facilitate the food industry use of truthful, substantiated label claims including those for weight reduction. 14
- The AFGC recommends that initiatives to address overweight and obesity: 15
- be incorporated into the National Preventive Health Strategy; and 15
 - seek food industry engagement for both development and delivery of initiatives. 15
- The AFGC recommends that the Inquiry rejects any proposals to address the overweight and obesity issue through the imposition of taxes based on food composition as they are poorly targeted, inequitable and ineffective. 16
- The AFGC recommends that the Inquiry: 16
- rejects proposals to address the overweight and obesity issue using broad based subsidies on food products based on food composition as they are poorly targeted, inequitable and ineffective; and 16
- The AFGC recommends that the Inquiry reject any proposals for 'traffic light' food classification of foods as the basis for policy initiatives. 19

4 INTRODUCTION

The AFGC welcomes the opportunity to make this submission to the *House of Representatives Standing Committee on Health and Ageing Inquiry into Obesity in Australia* ('the Inquiry').

The AFGC submission comprises:

- General Comments on the overweight and obesity issue and contributing factors;
- Specific Comments discussing:
 - the context of the current review;
 - the food processing industry's actions to date in response to the issue;
 - future opportunities for the industry to partner with Government and non-government organisations; and
 - the AFGC concerns regarding inappropriate policy and regulatory responses which may result.

The submission will restrict its comments to overweight as the [sometimes] precursor to obesity as minor modifications in diet, coupled with other lifestyle changes, can effectively address this issue.

The submission will not address obesity as a clinical disease and clinical interventions appropriate to obese individuals. Whilst diet clearly plays a role in returning these individuals to health each intervention requires considered action, tailored to the individual.

5 GENERAL COMMENTS

5.1 OVERWEIGHT AND OBESITY - CAUSES

There is no doubt that the incidence of overweight (BMI>25)¹ in adults has increased substantially in recent decades. In developed countries the levels, particularly in men, have become a major cause for concern amongst health authorities. Similarly, studies have shown that overweight and obesity in children has increased to worrying levels.

The fundamental cause of individuals becoming overweight is well understood – over a period of time more energy is consumed than is expended in body maintenance and physical activity with the excess being stored as fat. Relatively small excesses of energy intake over energy expenditure sustained over a long period of time are responsible [mostly] for individuals becoming overweight (and ultimately obese). And the converse is true – minor modification to diets and lifestyles sustained of a long period of time can return overweight individuals to a healthy weight.

Less well understood are the factors (and their interactions) that lead individuals to consistently eat a little more energy than they need – or conversely be a little less physically active than they ought to be, based on their energy consumption. Indeed, in the absence of

¹ Body Mass Index.

clear individual causes of overweight health professionals have developed the concept of an “obesogenic environment”ⁱⁱ. In essence, this identifies, and lumps together, the many factors which can influence energy intake and expenditure including food composition (i.e. macronutrient levels, and particularly fat and carbohydrate), food access (affordability and availability) and food culture (promotion and societal habits), the built environment, public transport and the car culture, increased screen time (for children) and changing work habits (longer hours, more sedentary employment).

5.2 OVERWEIGHT AND OBESITY - CONSEQUENCES

The consequences of overweight and obesity are substantial at both the individual and population level. Overweight and obesity is associated with diseases such as heart disease, high blood pressure, and diabetes. These diseases substantially reduce the life expectancy of individuals and reduce their quality of life, and that of their families. At the population level the economic burden is large. The total financial cost of obesity in Australia in 2005 was estimated to be \$21 billion (\$3.7 billion in the health system and carer costs plus costs to individuals of \$17.2 billion)ⁱⁱⁱ.

5.3 OVERWEIGHT AND OBESITY – TACKLING THE ISSUE

The overweight and obesity issue is, therefore a highly complex, costly issue. It must be addressed. Indeed other developed countries have devoted considerable resources to reviewing the obesity challenge, and reflecting its complexity, introduced initiatives targeting a number of areas. The UK, for example, has recently launched the *Healthy Weight, Healthy Lives: A Cross-Government Strategy for England*. The strategy encompasses better monitoring of children’s health and providing advice on healthy eating and physical activity through schools, promoting healthier food choices through working with industry to formulate foods to assist consumers construct health diets, building physical activity into lives, creating incentives for better health through assisting lifestyle choices and providing more information to individuals on diet, activity and health.

There is some evidence that such broad-based strategies work. In France the EPODE program (*Ensemble, Prévenons l’Obésité Des Enfants, Together, we can prevent obesity in children*)^{iv} has demonstrated that direct interventions into lifestyle choices (education focus on nutrition and diet) of children have positives outcomes. Follow-up initiatives including promoting physical activity are now underway.

In Australia Governments at Commonwealth and State and Territory levels have developed and implemented programs to address the levels of overweight and obesity. The Commonwealth’s *Healthy Active Australia*^v addresses both healthy eating and physical activity through a number of targeted initiatives. Specific initiatives for younger Australians have also been developed such as the *Healthy Weight 2008 Australia’s Future. The National*

ⁱⁱ www.foresight.gov.uk/obesity/Outputs/Evidence_review_Obesogenic_Environments.

ⁱⁱⁱ Access Economics. The economic costs of obesity. Report to Diabetes Australia. October 2006.

^{iv} www.epode.fr

^v www.healthyactive.gov.au

*Action Agenda for Children and young people and their families*⁸. Complementing and augmenting these programs States and Territories have developed their own approaches, again with nutrition education and promotion of physical activity as key objectives.

5.4 BASES FOR FUTURE GOVERNMENT ACTION

Notwithstanding the AFGC's strong support for Governments to address the overweight and obesity issue as a priority, the AFGC is concerned that comprehensive data on the nutritional status of Australians is unavailable. The last National Nutritional Survey was published in 1995 and although smaller studies have been conducted since then the lack of national data hinders good policy development.

The AFGC has partnered the Commonwealth Government to support a National Children Nutrition and Physical Activity Survey which is due to report mid-2008 (see below). The Commonwealth has confirmed that a new National Nutrition Survey will be undertaken in the next two years (the project is just commencing within the Department of Health and Ageing). The AFGC considers the survey will be invaluable in informing policy direction and priority. Specifically, although the AFGC supports general preventive health approaches to the overweight and obesity issue – such as support for nutrition and physical activity education campaigns – direct interventions which might require substantial resources from both the public and private sector must be evidence based, identify clear objectives (including target populations), be proportionate and have a high likelihood of successfully achieving desired outcomes. Good data is a prerequisite to sensible development of cost-effective targeted, policy and program initiatives. The AFGC counsels the careful consideration of the basis of any substantial actions to address adult overweight and obesity which might be developed in the interim period to the completion of the upcoming National Nutrition Survey.

Recommendation

The AFGC recommends the Inquiry note the imminent release of the National Children's Nutrition and Physical Activity Survey and the forthcoming National Nutrition Survey and the value of the data they will provide in informing Government policy development to address overweight and obesity.

6 SPECIFIC COMMENTS

6.1 THE CURRENT INQUIRY – THE CONTEXT

It is now over five years since the concerns about the rise in the incidence of child and adult obesity became acute in many developed countries. Since that time research into its causes and consequential government policy responses have confirmed that tackling the problem requires a multi-pronged approach. In Australia this is also the case – successfully reducing the incidence of overweight and obesity requires a broad cross-sectoral approach involving a partnership between several government portfolios, the food industry (manufacturing and retailing) and non-government organisations. The Commonwealth

Government has a critical leadership and co-ordinating role in this regard. It is a national challenge requiring a national approach to its solution.

The AFGC notes that the Rudd Government has established a Preventive Health Task Force with overweight and obesity identified as an area of focus. The AFGC will seek opportunities to work with the Task Force in the development of a comprehensive policy and program in this area (see below).

The AFGC considers therefore that the current Inquiry is timely. It is appropriate to review the effectiveness of programs which have been developed over the last five years at Commonwealth, State and Territory levels. It is important that the review includes an assessment of the delivery of programs. The AFGC is concerned that although there is no shortage of Government initiatives at the bureaucracy level some may have fallen short in delivering concrete programs to communities. The outcome of the Inquiry can subsequently be fed into the deliberations of the Preventive Health Task Force.

Recommendation

The AFGC recommends that the Inquiry include a review of the delivery of Commonwealth and State and Territory programs which have been developed and implemented in the last five years to address the overweight and obesity issue.

The AFGC considers that any new programs should build on those which are already in place (subject to a review of their effectiveness to date) rather than returning to square one. The preparatory work to tackle overweight and obesity has already been done and there should be safeguards to ensure there is limited “re-invention” in any new program or initiative.

6.2 FOOD INDUSTRY RESPONSE AND ACTIONS

Since its inception in 1995 the AFGC has maintained a strong policy focus on nutrition and health. This reflects long standing, and the well-established, nexus between diet and health outcomes and recognition by the food processing industry that it has a central role to play in providing consumers with a range of wholesome and nutritious products to meet both their dietary and lifestyle needs.

Thus well before the current heightened concerns regarding the incidence of overweight and obesity among adults and children the food industry had established a strong record of bring innovative new products with new formulations better to protect and promote good health. Among these were reduced energy products particularly suited to consumers wishing to moderate their calorie intake, and other products formulated to address specific health concerns – such as low saturated fat products targeted at consumers seeking to reduce their risk of heart disease, and low salt products for those concerned about hypertension.

Notwithstanding the proud record of the industry the heightened concerns regarding overweight and obesity from 2001 onwards lead the food industry and the AFGC to assess whether further action could, and should be taken by industry to address the issue. As result the AFGC and individual companies have taken concrete steps to assist in addressing the obesity issue. These are addressed in turn below.

6.2.1 National Children's Nutrition and Physical Activity Survey

The National Nutrition Survey reported in 1995 and still represents the only comprehensive, authoritative survey on the incidence of overweight and obesity in children and adults in Australia – and clearly the data is now significantly dated. There have been numerous lesser surveys conducted by State and Territory governments, and public health organisations and whilst these have provided indications the incidences of overweight and obesity have risen they have not provide the 'national' perspective necessary for the development of policy, and subsequent measures, to address the issue. In short, whilst the problem of overweight and obesity has been identified – it is still not clear as to its extent and nature.

The AFGC recognised this in 2006 and proposed to the Commonwealth Government that it was critically important to conduct a national survey of children's nutritional status and levels of physical activity. The Commonwealth agreed and the AFGC committed \$1million to support the survey in partnership with the Department of Health and Aging, and the Department of Agriculture, Fisheries and Forestry. The total cost of the survey was in excess of \$3 million.

That survey has now been completed and the report is in the final stages of preparation. It is anticipated that it will be publicly available in July 2008.

The AFGC considers it critically important that the results of the survey inform Government policy in the area of children's nutrition and health – including in the area of overweight and obesity.

Recommendation

The AFGC recommends the Inquiry take time to be comprehensively informed by the results of the National Children's Nutrition and Physical Activity Survey which is due for release in mid July 2008.

6.2.2 Daily Intake Guide – a food labelling initiative

The AFGC has always considered food labels to be a valuable means of providing information to consumers to assist healthy diet and lifestyle choices. In 2006 the AFGC launched a new, voluntary front of pack labelling scheme – the Daily Intake Guide (DIG). The DIG program provides a means (i.e. an agreed, uniform format) for companies to present information on the amount of energy and other key nutrients (protein, fat, saturated fat, carbohydrates, sugars and sodium) in a food in absolute terms (e.g. grams per serve) and as a percentage of an average adult diet. Consumers are able to rapidly compare products and consider the contribution the foods may make to their dietary requirements. As such it encourages consumers to think about foods providing for their own particular needs and to take responsibility for constructing healthy diets as part of an overall healthy diet.

Uptake of the DIG program has been steady and now over 500 products in Australia and New Zealand are carrying the 'thumbnail' labels on which the nutritional information is presented. A copy of the DIG Labelling Scheme is provided in [Appendix 1](#).

In March 2008 the AFGC launched a series of Community Service Announcements (print and broadcast media) describing the DIG labels to Australian consumers and encouraging their use ([Appendix 2](#)). This is seen as a critical element to the success of the program. The AFGC is also conducting research to measure consumer awareness of the scheme to monitor its impact in the market place.

The AFGC anticipates further expansion of the DIG program. Any food company (members and non-members of the AFGC) can adopt the labelling scheme. The AFGC provides the format guide free of charge, and there is no license fee and publicly available from the AFGC website www.afgc.org.au.

The program is consistent with the direction most of the European Union is taking and recently the European Commission^{vi} determined its preference for this approach compared to alternatives such as the traffic light labelling schemes^{vii} adopted in the United Kingdom.

The AFGC also considers the DIG scheme superior to traffic light symbols. Conventional nutritional wisdom advises that all foods can be incorporated into healthy diets and consumers should be encouraged to consider balance, moderation and variety when choosing their foods. Traffic light symbols imply that 'red food' should not be eaten at all, 'amber foods' may be eaten, and 'green foods' can be consumed without concern. These messages are not consistent with consumers being encouraged to consider their own dietary needs as part of overall lifestyle choices. The beauty of the DIG system is that it assists food consumption decisions and not simply food purchasing decisions.

Recommendation

The AFGC recommends the AFGC DIG scheme be supported by the Inquiry as a superior labelling approach providing valuable information to assist consumers food purchasing and food consumption choices.

6.2.3 Further Industry Commitments

The AFGC and its member companies are committed to helping consumers make informed choices that best meet their nutrition and activity needs. Apart from supporting the DIG program AFGC companies are also:

- expanding their range of products with reduced energy content and a wider range of portion sizes to meet consumer needs;
- seeking ways to expand the variety of food available in vending machines and review their placement, particularly with respect to schools;
- continuing to promote information on nutrition and health to consumers through a variety of mechanisms (labels, advertisements, in-store promotions etc);
- working with retailers, suppliers, advertising agencies and the media to encourage broader promotion of nutrition and health information;

^{vi} www.europa.eu/rapid/pressReleaseAction.do?reference=IP/08/112

^{vii} 'traffic light' symbols red, amber and green are used on food packaging based on nutrient profiles.

- encouraging government to raise awareness of the consequences of obesity, the benefits of being physically active, and the need to balance food intake and activity through public education;
- advocating and participating in programs that promote nutrition education and physical activity in schools, and in those communities where our food companies are located; and
- promoting workplace schemes that encourage health and fitness among employees of the food industry.

6.2.4 Food and Beverage Marketing

The AFGC recognises that advertising not only informs consumers about the products available in the market but can also influence purchasing decisions. It is uncertain the extent to which advertising may, or may not, influence overall consumption of food in the whole of diet context and therefore its potential impact on health.

The AFGC supports the responsible marketing of food and beverages to all consumers with promotions and advice being consistent with concepts of moderate consumption and the importance of a balanced diet. The AFGC also recognises the need for greater care in marketing foods to children. The AFGC supports the AANA's Food and Beverages Advertising and Marketing Communications Code which became effective on 1 November 2006. The code was developed with particular reference to the AANA Advertiser Code of Ethics and the AANA Code for Advertising to Children. It is based on the recommendations of the International Chamber of Commerce as endorsed internationally by the World Federation of Advertisers. Compliance with the code is administered by the Advertising Standards Bureau. A copy of is available on the AANA's website: www.aana.com.au/food_beverages_code.html.

6.3 FUTURE OPPORTUNITIES

6.3.1 Remove regulatory impediments to better information

Currently the Australia New Zealand Food Standard Codes prohibits health claims including claims on food products regarding weight reduction. The AFGC has long advocated a measured relaxation of this prohibition to allow truthful, substantiated nutrition, health and related claims to be made on food products. Indeed, it is difficult to understand what justification there can be, given the concerns about diet and health in the community, for restricting consumers access to information about how food products can contribute to better health – including weight reduction.

Food Standards Australia New Zealand (FSANZ) has recently recommended^{viii} an amendment to the Australia New Zealand Food Standards Code which permits, under prescribed circumstances health claims, including weight reduction claims. The AFGC does not, however, consider the draft Standard well-suited to industry making claims. The AFGC is now advocating a more flexible approach which might include an industry Code

^{viii} www.foodstandards.gov.au. Final Assessment Report. Proposal 293 Nutrition, Health and Related Claims.

of Practice complementing regulation. The intention is to provide a regulatory framework which allows for industry to make claims about products which are:

- truthful, and scientifically substantiated;
- presented in the context of a healthy diet and lifestyle;
- moderate and responsible in their language to avoid misleading consumers; and
- do not promise or raise undue expectations regarding health outcomes.

Recommendation

The AFGC recommends the Inquiry support a flexible health claims regulatory framework to facilitate the food industry use of truthful, substantiated label claims including those for weight reduction.

The AFGC considers that introduction of a workable health claims system will drive innovation of food products, including development of products able to assist weight management.

6.3.2 National Preventive Health Strategy

The Australian food industry has a proud record of providing safe, nutritious, affordable, convenient food products meeting the needs of an extremely diverse population – in age, culture and lifestyles. Food industry provides products which are enhanced in a myriad of ways – low fat, high fibre, low salt etc. A quick glance at the dairy cabinet reveals six or seven different varieties of milk – whole milk, no fat, low fat, added calcium, added vitamins and added omega-3 oils and that's before the range of flavoured milks is considered. Most were not available 15 years ago. Similar stories are told in breakfast cereals, soft drinks, breads, cheeses etc. When the great increase in the availability of foods from different cultural backgrounds is considered it becomes very apparent that consumers have never had such a wide choice of foods from which to construct healthy diets.

Similarly, the food industry has never had such a focus on health and well-being as a basis for marketing its products, reflecting ever increasing consumer interest and desire for healthy lifestyle choices. As nutritional science has advanced, the last 20 years has witnessed food products moving from providing basic nutrition through to being specially formulated to provide for improved physiological function and better health outcomes. And notwithstanding the continuing difficulties with regulatory prohibitions on health claims, food companies have been able to create product differentiation and positioning based on health and wellness – in effect establishing a preventive health platform for a whole range of food products and brand.

The marketing of these products, coupled with the context of healthy diets and lifestyles in which they are promoted, provides great opportunity for partnerships with Government preventive health strategies and initiatives. The AFGC has called for the Rudd Government's new National Preventive Health Strategy to engage with industry to explore ways in which Government can harness both the marketing expertise and the food technological skills of the food industry.

Overweight and obesity, and associated diseases have been identified as key targets for National Preventive Health Strategy and the obvious connection with diet highlights the

importance of food industry participation. Clearly the current Inquiry into Obesity should consider its outcomes in terms of incorporation into the National Preventive Health Strategy.

Recommendation

The AFGC recommends that initiatives to address overweight and obesity:

- **be incorporated into the National Preventive Health Strategy; and**
- **seek food industry engagement for both development and delivery of initiatives.**

6.4 INAPPROPRIATE POLICY AND REGULATORY RESPONSES

6.4.1 “Fat” Taxes

Obesity is a clinical condition and individuals with obesity require individual clinical interventions to treat their condition. Thus broad based public health initiatives are not appropriate for addressing obesity *per se*.

For many individuals, however, obesity is the end result of normal weight individuals firstly becoming overweight, and then obese. Broad-based public health initiatives can be effective in early prevention and arresting these transitions for individuals with population level benefits for health outcomes.

Public concern regarding apparent the rising incidence of overweight and obesity has led to calls from some quarters for the imposition of taxes on foods which may be high in fat, sugar and energy. The proposition is that increasing the price of high fat, sugar and energy products will discourage their consumption. There have also been proposals for subsidies on lower energy foods such as fruits and vegetables to encourage their consumption.

The AFGC opposes the imposition of taxes on food and beverages for public health purposes including addressing the obesity issue. The AFGC’s specific objections are that:

- such taxes would be ill-targeted – they cannot be restricted solely to overweight and obese individuals, and indeed many individuals who have a high energy demand would be penalised;
- it is socially inequitable with the poorer-off paying proportionately more of their disposable income for food;
- there is no evidence that consumption patterns for food products would change as food consumption is generally price inelastic. Very high levels of tax may be effective – but at the greater expense of social equity;
- the tax would be extremely complex to design and administer, imposing significant compliance costs on the community and administrative costs on the Australian Taxation Office. If levied at the retail product level whole classes of food and their formulations would need to be incorporated into the tax code. If levied at the ingredient level, domestically manufactured products would be competitively disadvantaged on both the domestic and export market; and

- there may be issues with Australia's obligations under World Trade Organisation (WTO) Treaties due to potential different treatment of different classes of imported food products.

Recommendation

The AFGC recommends that the Inquiry rejects any proposals to address the overweight and obesity issue through the imposition of taxes based on food composition as they are poorly targeted, inequitable and ineffective.

6.4.2 Subsidies on Foods

The AFGC has similar opposition to general broad-based subsidies on food products being used as a means to influence food consumption – they are poorly targeted, inequitable and there is no evidence that they will shift consumption substantially unless struck at a very high level. At reasonable levels, the rich will benefit as much as the poor, and the thin as much as the overweight. And again, the system will be highly complex to develop and administer and highly likely to competitively disadvantage some products, perhaps transgressing WTO obligations.

The AFGC recognises, however, that in some cases overweight and obesity is linked to socio-economic status and disadvantaged individuals may benefit from assistance in purchasing foods more appropriate to their particular dietary needs. They must be seen, however, for what they are – that is a targeted program of social welfare.

Recommendation

The AFGC recommends that the Inquiry:

- **rejects proposals to address the overweight and obesity issue using broad based subsidies on food products based on food composition as they are poorly targeted, inequitable and ineffective.**

6.4.3 Restrictions on the sale and promotion of food products

In the last two years a number of health authorities around Australia have introduced “healthy eating programs” which restrict the sale and promotion of some food products in canteens, kiosks and vending machines under their control (i.e. through leasing agreements). The programs classify foods as “red”, “amber” and “green” based on their macronutrient composition with greatest restrictions, and in some cases complete banning, imposed on “red” foods.

The AFGC strongly opposes the use of a traffic light classification system to identify so called ‘healthy’ and ‘unhealthy’ foods and drinks as:

1. it is a scientifically flawed concept with no basis in current nutritional wisdom;
2. it misrepresents healthy eating advice as provided in the national dietary guidelines;
3. it will not achieve the proposed objectives;
4. it sends the wrong message to Australians regarding how healthy diets should be constructed; and

5. it diverts attention and resources from more effective government policies.

Each of these issues is addressed below.

A scientifically flawed concept

Traffic light systems, as the basis for classifying foods and drinks as being 'healthy' or 'unhealthy' are fundamentally flawed. It ignores the fundamental and mainstream nutritional wisdom accepted by nutritionists and dietitians that there are no unhealthy foods, only unhealthy diets. The corollary to this is that all foods can be incorporated into healthy diets.

Nutrient profiling is most useful for constructing balanced diets for individuals for specific health objectives where the most accurate estimations of dietary needs can be assessed based on gender, age, physical activity and health status. It becomes less useful as the target group broadens and/or the health objective becomes more general. It becomes meaningless as a basis for providing population level dietary advice due to the high variability of the nutritional needs of individual consumers. Dietary guidelines recommending nutrient intakes are more appropriate.

Echoing these points a European Food Safety Authority expert panel convened to review the scientific basis of nutrient profiling recently concluded '*There is an inherent difficulty in seeking to apply to individual food products nutrient intake recommendations that are established for the overall diet*'.^{ix}

Thus the AFGC considers nutrient profiling initiatives targeted at the general population with no specific population health outcome identified run contrary to nutritional wisdom and have no sound, scientific basis for general healthy eating advice.

Furthermore, imposing artificial boundaries on nutrient levels may pull the focus of industry innovation from health promoting food products onto compositional manipulations to gain permission to sell or market. In the longer term this may limit dietary options benefiting consumer health.

The AFGC recognises, however, that eating healthily requires knowledge of nutrition and the role of foods in healthy lifestyles. Limiting the promotion and availability of foods in school canteens is appropriate as children are neither skilled, nor responsible enough, to select healthy diets; as opposed to food outlets in servicing responsible adults.

The AFGC considers there is a role for nutritional profiling as the basis for dietary manipulation when:

1. the proposed outcomes are well described and substantial enough to warrant intervention;
2. sound evidence is presented that there is a good chance of success; and

^{ix} The setting of nutrient profiles for foods bearing nutrition and health claims pursuant to Article 4 of the Regulation (EC) No 1924/2006. Scientific Opinion of the Panel on Dietetic Products, Nutrition and Allergies (Request N° EFSA-Q-2007-058). http://www.efsa.europa.eu/EFSA/Scientific_Opinion/nda_op_ej644_nutrien%20profiles_summary_en.pdf

3. other measures to achieve the same outcome have been fully considered and discounted.

The AFGC opposes nutrient profiling when:

1. targeted at the general population with no specific population health outcome identified;
2. based on an unsound 'good food/bad food' approach, rather than supporting the healthy, balanced diet approach;
3. applied inflexibly with a single set of nutrient levels across broad categories;
4. unable to take into consideration changing understanding of nutrition;
5. restricting consumer choice and information through the banning of promotion and sale of particular food products, except in special circumstances such as school canteens; or
6. general guidelines appropriate to diets are applied to individual foods.

As public policy the AFGC opposes the initiatives of health departments to introduce traffic light classification systems as fundamentally flawed as:

1. they fail to adequately describe the outcomes they seek to secure and provide no evidence that they will be successful in achieving any outcome beyond merely restricting the promotion and sale of some foods;
2. they are based on applying general dietary guidelines to individual foods as a basis for restricting sale and promotion of some foods;
3. they perpetuate the 'good food/bad food' falsehood rather than supporting consumers to select healthy, balanced diets;
4. they give no reference to how the programs will be monitored and changed in response to new information regarding its appropriateness or effectiveness; and
5. they are to be applied inflexibly – there is not reference to mechanisms for the negotiation of the classification of individual food products.

The AFGC considers the health departments do have the right and responsibility for ensuring that food outlets in its health facilities meet the needs of staff and visitors through offering a range of foods from which a wide variety of healthy diets can be constructed. This can be achieved through a policy which actively encourages outlet managers to consider the needs of their customers and maximise as far a practical the choices they provide.

The traffic light classification schemes are potentially harmful by implying that 'green' foods may be consumed without regard to the usual caveats of variety, moderation and balance, particularly if the schemes are heavily promoted. They send the message that 'green' foods have been given an 'official' approval which for some consumers will be construed as meaning that usual dietary precautions may not be required. The approach does nothing to reflect that all foods need to be consumed following consideration of the individual's dietary requirements.

Recommendation

The AFGC recommends that the Inquiry reject any proposals for 'traffic light' food classification of foods as the basis for policy initiatives.

7 CONCLUSION

The AFGC strongly supports continued efforts to understand the factors influencing the incidence of overweight and obesity along with other diet related diseases.

The AFGC and food companies in Australia are well advanced in developing and implementing concrete programs to gather data about the nature of the problem, and to provide information to consumers to assist them make food choices appropriate to their needs.

The food industry and its actions can be integral to further policy and program initiatives, particularly as they relate to the National Preventive Health Strategy.

APPENDIX 1: DAILY INTAKE LABELLING SCHEME



OVERVIEW

1 SCHEME OVERVIEW

The Daily Intake Guide is the presentation in a simple thumbnail format of the amount per serve for energy, and the six nutrients - protein, carbohydrate, sugars, fat, saturated fat, and sodium - and the percentage of daily intake these represent per serve.

The Daily Intake value is derived from the average adult Australian diet of 8700kJ energy intake. An individual's daily intake may be higher or lower depending on their energy needs and this information is a guide not a prescribed amount. This is to be referenced on pack, see pages 8 and 15.

This is a voluntary scheme but if a company chooses to use it, its application should be consistent with this guide in order to avoid causing confusion for consumers through multiple variations.

The preferred placement is on front-of-pack. Variation from this should occur only if the product is labelled using the complimentary Be Treatwise scheme (www.betreatwise.info) or if the pack size is so small that it does not allow for the thumbnails to be presented in a legible size.

The minimum element is energy per serve. Where the % daily intake for energy is presented using the agreed thumbnail presentation style, % daily intakes must be provided for the average adult (based on a daily 8700kJ intake) within the nutrition information panel for the six nutrients (protein, fat, saturated fat, carbohydrate, sugars and sodium) and energy.

The recommended approach is to provide thumbnails for energy plus the six nutrients (protein, fat, saturated fat, carbohydrate, sugars and sodium). If space is limited, then energy alone should be presented. It is not permissible to present some of the six nutrients. It is all or none. Whatever the approach, where reference to any %DI, either by thumbnail or in the nutrition information panel (NIP), all seven %DI elements must appear in the NIP. This is a requirement of the Food Standards Code.

Small or unusually shaped packs should provide energy and nutrition information consistent with the requirements of the Food Standards Code.

Extremely small packs that are sold individually should, where possible, make reference to alternate sources for nutrition information about the product, for example, by providing a statement referring the consumer to a website or a Consumer helpline.

The Daily Intake Guide labelling scheme may not be relevant for products that have little or no nutritional content relevant to DI values, e.g. plain (unflavoured, unsweetened, no added ingredients) coffee, tea and water, and herbs and spices.

Manufacturers are free to provide more information using the agreed thumbnail presentation style provided the information is allowed under the Food Standards Code. That means that if the Food Standards Code provides for a daily intake or a recommended daily intake, the element may be added. A daily intake for a nutrient must not be added if a number is not already available under the Food Standards Code.

The graphical representation [thumbnail] must be presented in a consistent monochromatic colour, subject to legibility requirements. See style guide for further information.



The thumbnail must include the per serve information.
Eg per 80g serve or per 125 ml serve.



Example with optional additional elements (must include minimum required element)



WHY A DAILY INTAKE GUIDE IS NEEDED

The Daily Intake Guide labelling scheme was developed as a result of industry's Nutrition and Health Strategy, which included commitments to more prominently display energy per serve, preferably on front-of-pack, and where possible the proportion of daily intake that represents.

There are many ways this information can be presented but consumers find it difficult to deal with too many different labelling formats. To avoid confusion, the Australian food and beverage industry developed a standardised scheme based around the concepts of daily intake and energy per serve as these provide the most utility to consumers wanting to understand their dietary needs.

The Daily Intake Guide helps consumers to understand information about the amount of energy and nutrients a product contains and how much a serve contributes towards their daily requirements. Food companies are already required by law to provide information to consumers about the nutrient content (protein, carbohydrate, sugars, fat, saturated fat, and sodium) and energy of every serve of a product. The Daily Intake Guide provides additional information in a simple thumbnail presentation. Consumers can see, at-a-glance, information about the composition of the product and its relevance to their diet.

The new labels work like this.

The icon provides information about the energy content of one serving of the product that you intend to eat. In this example, each serving of product contains 870 kJ of energy.



This is the percentage of your daily energy allowance contained in a product serving. In this example, each serving of product covers 10% of the daily allowance.

For example, what consumers know by reading the nutrition information panel is that by eating a 80 gram serve of a particular product they will be consuming 870 kilojoules. Daily intake labelling tells them that eating those same 870 kilojoules represents 10 per cent of their daily energy needs.

Our research demonstrates that consumers understand the Daily Intake Guide and find it useful. It allows them to see the relationship between a serve of food and their daily requirements. For example a serve of food that contributes no more than 7 per cent of their daily energy requirements would make an acceptable snack,

but by viewing the fat, sugar and salt content they can also make a decision about whether they feel it is the right snack for them.

More information is available on www.mydailyintake.net. This website takes people through daily intakes for energy and nutrients, such as sugars, fats and sodium and shows them how to use the Daily Intake Guide to manage these. The website also features a calculator that helps people work out their own daily energy needs.

This scheme was launched in November 2006 with the support of a number of leading food and beverage companies as well as McDonald's, Metcash, the Australian Beverages Council and the Confectionery Manufacturers of Australasia.

Other companies wishing to adopt this scheme may do so free of charge. However, in choosing to adopt the scheme the companies must then agree to apply it according to the following style guide.

OBJECTIVES



In developing the Daily Intake Guide, the AFGC aims to:

- » provides consumers with the required information for them to make an *informed* choice about their food
- » demonstrate that the food and beverage industry is a responsible partner committed to playing its role in providing consumers with the necessary means to make informed choices
- » counter the discriminatory categorisation of foods as "good" or "bad"—or other pejorative terminology.

KEY ELEMENTS OF THE SCHEME



Serving size principles

A key aspect of the Daily Intake Guide Labelling scheme is the expression of information as the percentage daily intake per serve of the food.

To assist with this process, the AFGC has developed principles for the appropriate use of serving size.

Guidance

- » It is the manufacturer's responsibility to determine the serving or portion size for a food or beverage product.
- » Single serve items should be appropriate sizes for the target market.
- » The serving portion should be realistic (at both the lower and upper levels).
- » If a product is packed such that it can be reasonably expected to be consumed by the target market in one serving then the pack should be the "serving size", and the energy and nutrient content of the whole pack should be clearly indicated.
- » Multiple serve items should consist of appropriate serve sizes in relation to single serve packs.
- » Serve sizes must not be used inappropriately to manipulate energy or nutrient content per serve.
- » Daily intakes for recipe mixes and sauces for meal solutions, and cereals may be provided for either as sold or as consumed.
- » The Daily Intake Guide labelling scheme may not be relevant for products that have little or no nutritional content relevant to DI values, e.g. plain (unflavoured, unsweetened, no added ingredients) coffee, tea and water, and herbs and spices.

The AFGC is undertaking further work to consider whether standardised serving sizes can be agreed within categories.

Daily intake information

The Food Standards Code (1.2.8) provides a voluntary provision to include in the nutrition information panel a column listing percentage daily intakes (% DI). It also provides values on the daily intake to be used when determining the % DI.

Extract from FSC Standard 1.2.8

Sub Clause 7: Percentage daily intake information

- (1) Information relating to the percentage daily intake of nutrients set out in a nutrition information panel may be included in the panel.
- (2) Where percentage daily intake information is included in a panel –
 - (a) the percentage daily intake of dietary fibre may be included in the panel; and
 - (b) the following matters must be included in the panel –
 - (i) the percentage daily intake of energy, fat, saturated fatty acids, carbohydrate, sugars, protein and sodium; and
 - (ii) the statement –

"Percentage daily intakes are based on an average adult diet of 8700 kJ. Your daily intakes may be higher or lower depending on your energy needs."

- (3) The percentage daily intakes of the food components listed in column 1 of the Table to this sub clause that are included in the panel, must be calculated using the corresponding reference value specified in column 2.

Table to sub clause 7(3)

Column 1 Food Component	Column 2 Reference Value
Energy	8700 kJ
Protein	50 g
Fat	70 g
Saturated fatty acids	24 g
Carbohydrate	310 g
Sodium	2300 mg
Sugars	90 g
Dietary fibre (if included)	30 g

EDITORIAL NOTE:

The inclusion of %DI information in the nutrition information panel is voluntary. However, if a thumbnail appears for energy, all nutrients must be listed in the NIP.

An example of a recommended nutrition information panel for mandatory nutrients that incorporates the optional %DI element is set out below.

NUTRITION INFORMATION			
Servings per package: (insert number of servings)			
Serving size: g (or mL or other units as appropriate)			
	Quantity per Serving	% Daily Intake* (per Serving)	Quantity per 100 g (or 100 mL)
Energy	kJ (Cal)	%	kJ (Cal)
Protein	g	%	g
Fat, total	g	%	g
- saturated	g	%	g
Carbohydrate	g	%	g
- sugars	g	%	g
Sodium	mg (mmol)	%	mg (mmol)
(Insert any other nutrient or biologically active substance to be declared)	g, mg, µg (or other units as appropriate)	%	g, mg, µg (or other units as appropriate)

* Percentage Daily Intakes are based on an average adult diet of 8700kJ. Your daily intakes may be higher or lower depending on your energy needs.

Declaration of % DI information

To ensure consistency in approach, the following guidance is provided

Guidance

Individual % DI values should be:

- » based on the nutritional content or for energy, the kilojoule content per serving of a product
- » expressed as a percent of the total Daily Intake reference value from FSC (1.2.8) for a nutrient or for energy
- » expressed as a whole number (unless <1)
- » values above 1 with a following decimal below 0.5 should be rounded down and values above 1 with a following decimal of 0.5 or above should be rounded up to the next whole number
- » where the labelled value is less than 1, then a single decimal point should be used preceded by a 0 eg 0.4% , 0.7% etc
- » where the labelled value for a nutrient is "0", statement of a % DI is at the discretion of the manufacturer.

The % DI for nutrients should be based on the values given in the FSC (Standard 1.2.8, sub clause 7, Table to sub clause 7(3)).

The statement "Percentage Daily Intakes are based on an average adult diet of 8700kJ. Your daily intakes may be higher or lower depending on your energy needs" is required in association with the NIP

Manufacturers are free to include additional % DI information:

- » as long as it is relevant to the product
- » as long as it is consistent with the requirements of the Food Standards Code (Standard 1.2.8).

Representation – using the thumbnail - and labelling requirements:

- » Manufacturers choosing to use Daily Intake Guide labelling for nutrients must include the core elements of the thumbnail, which are the name of the nutrient, the number of grams/kJ, the percentage value and the serve size.
- » For foods and drinks that require preparation before consumption, i.e., dehydrated and concentrated products, nutrition information should be based, ideally, on the product "as prepared", according to the labelled instructions.
- » Small or unusually shaped packs should provide energy and nutrition information consistent with the requirements of the Food Standards Code.
- » Extremely small packs that are sold individually should, where possible, make reference to alternate sources for nutrition information about the product, for example, by providing a statement referring the consumer to a website or a Consumer helpline.
- » The Daily Intake Guide labelling scheme may not be relevant for products that have little or no nutritional content relevant to DI values, e.g. plain (unflavoured, unsweetened, no added ingredients) coffee, tea and water, and herbs and spices.
- » The use of green, amber or red to highlight the nutritional value of individual % DI's should be avoided. It is possible to use these colours when they are the primary colour of the pack.
- » The recommended format is monochromatic (single colour).

Declaration of kilojoules per serving and % DI for energy

Labels of food and drink products should display the non-discriminatory graphic, known as the thumbnail, to provide consumers with at-a-glance information on the kilojoule content for a serving of a product, and the relevance of this amount to the daily diet.

Guidance

- » When adopting the Daily Intake Guide labelling scheme, information on kilojoules per serving as presented in the thumbnail and the nutrition information panel must be consistent with the requirements of Standard 1.2.8 of the Food Standards Code.
- » The % DI for kilojoules should be based on the energy DI value given in the FSC (Standard 1.2.8, sub clause 7, Table to sub clause 7(3)).
- » When using the Daily Intake Guide labelling scheme, manufacturers must include the core elements of the thumbnail: the word "energy", the number of kilojoules, the percentage value and the serve size in the recommended format (per xxx serve).

PRACTICE

5 Putting the scheme into practice

Manufacturers are responsible for the graphic presentation of nutrition labelling, including %DIs, with implementation to be in line with the requirements of the FSC.

The information should be presented in a manner that will facilitate consumer understanding and use. Various approaches for implementation of the AFGC scheme are possible, depending on the size and shape of the pack, as well as other labelling information that must be provided. See the attached style guide for more information.

The commitment is voluntary but if used should include at a minimum the energy %DI information, front-of-pack, with the option to use the additional %DI information (all six nutrients) elsewhere (pack size and legibility requirements permitting).

On multipacks, it is permissible to display one set of thumbnails that represents the average daily intake values of all of the inner pack varieties. However, if you would normally provide a separate nutrition information panel for each variety, you may wish to include separate thumbnails for each. Manufacturers would need to carefully consider pack design in making this choice.

If pack size is sufficient and energy plus the six nutrients are being displayed, then a set for each variety would be required. The example below, illustrates one possible approach using the recommended minimum element when providing DI labelling as part of the Nutrition Labelling Scheme.

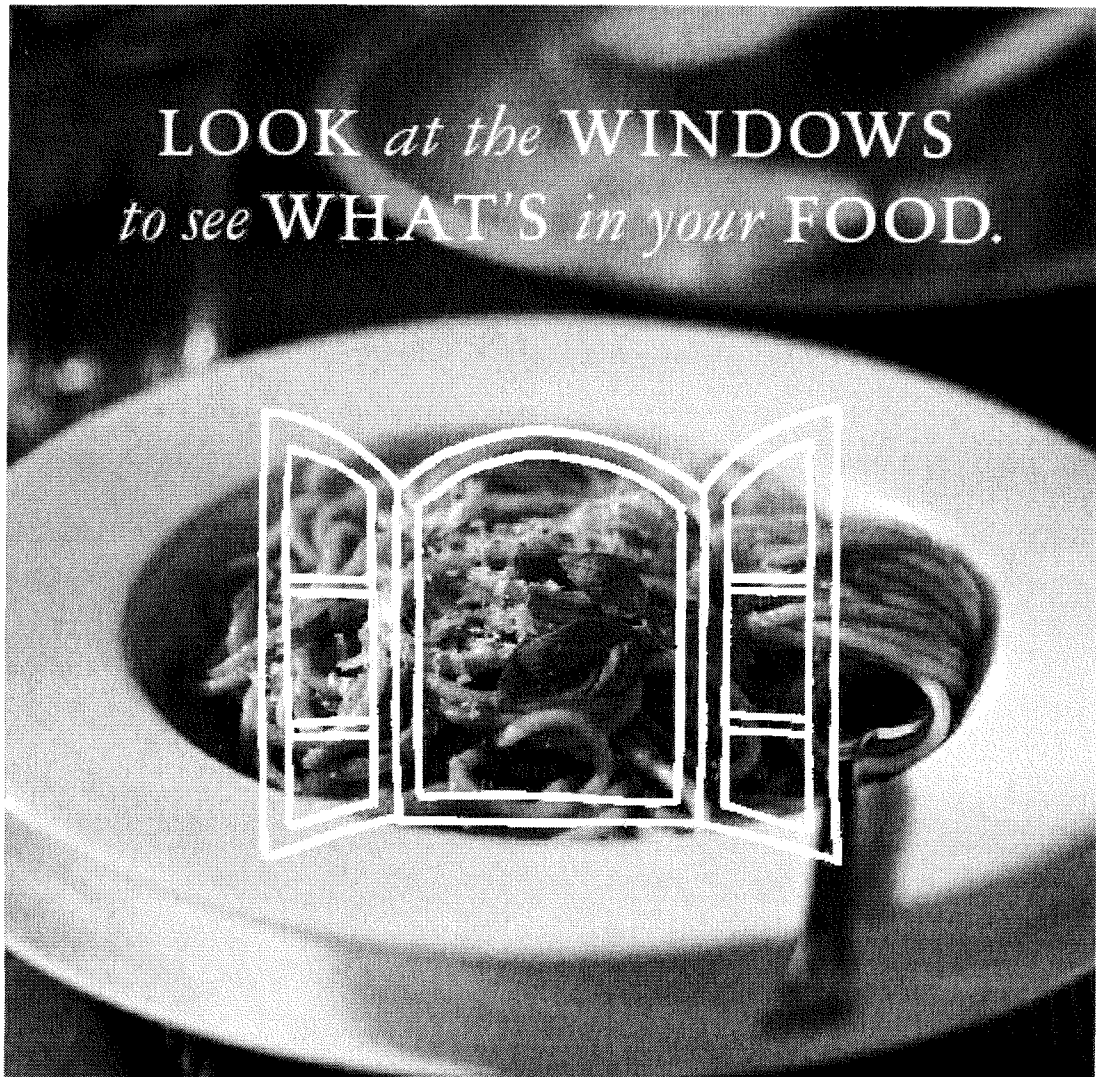
Example of required minimum element



Example with the optional additional elements (must include minimum required element and all six nutrients).

APPENDIX 2: PRINT MEDIA COMMUNITY SERVICE ANNOUNCEMENT

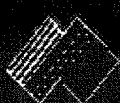
LOOK at the WINDOWS
to see WHAT'S *in your* FOOD.



ENERGY 1573 kJ	PROTEIN 12.7 g	FAT 2.7 g	SAT FAT 0.5 g	CARBS 74 g	SUGAR 7.6 g	SODIUM 682 mg
DI* 18%	DI* 25%	DI* 4%	DI* 2%	DI* 24%	DI* 8%	DI* 30%
PER SERVE ^A						

If you want to know more about what you're eating, you'll be happy to know that Daily Intake Guides are now appearing on many foods and drinks in your supermarket. The Daily Intake Guides are like little windows that make it easy to see what's in a serving, and how much it contributes to the average diet. When you know what's in your food, it's easy to choose what and how much to eat. **To find out more, go to mydailyintake.net**

^APercentage Daily Intakes are based on an average adult diet of 8700kJ. Your daily intake may be higher or lower depending on your energy needs.
^BThe Daily Intake amounts displayed above are based on the recommended serve size of pasta and sauce.



**AUSTRALIAN
 FOOD AND GROCERY
 COUNCIL**

APPENDIX 3: AFGC MEMBERS AS AT 26 MAY 2008

AAB Holdings Pty Limited	Kikkoman	Waters Trading Pty Ltd
Arnott's Biscuits Limited	KR Castlemaine	Wyeth Australia Pty Ltd
Snack Foods Limited	Kimberly-Clark Australia Pty Ltd	Yakult Australia Pty Ltd
The Kettle Chip Company Pty Ltd	Kerry Ingredients Australia Pty Ltd	
Asia-Pacific Blending Corporation Pty Ltd	Kraft Foods Limited	
Australian Pacific Paper Products	Lion Nathan Limited	
Barilla Australia Pty Ltd	Madura Tea Estates	
Beak & Johnston Pty Ltd	Manassen Foods Australia Pty Ltd	
BOC Gases Australia Limited	Manildra Harwood Sugars	
Bronte Industries Pty Ltd	Mars Australia	Associate members
Bulla Dairy Foods	Mars Food	Accenture
Bundaberg Brewed Drinks Pty Ltd	Mars Petcare	Australia Pork Limited
Bundaberg Sugar Limited	Mars Snackfood	ACI Operations Pty Ltd
Cadbury Schweppes Australia NZ	McCain Foods (Australia) Pty Ltd	Amcor Fibre Packaging
Campbell's Soup Australia	McCormick Foods Australia Pty Ltd	CAS
Cantarella Bros Pty Ltd	Merino Pty Ltd	CHEP Asia-Pacific
Cerebos (Australia) Limited	Merisant Australia Pty Ltd	Concurrent Activities
Christie Tea Pty Ltd	National Foods Limited	Dairy Australia
Clorox Australia Pty Ltd	Nerada Tea Pty Ltd	DHL Exel Supply Chain
Coca-Cola Amatil (Australia) Limited	Nestlé Australia Limited	Focus Information Logistics Pty Ltd
SPC Ardmona Operations Limited	Nestlé Foods & Beverages	Food Liaison Pty Ltd
Colgate-Palmolive Pty Ltd	Nestlé Confectionery	Food Science Australia
Coopers Brewery Limited	Nestlé Ice Cream	Foodbank Australia Limited
Dairy Farmers Group	Nestlé Chilled Dairy	IBM Business Consulting Services
Danisco Australia Pty Ltd	Nestlé Nutrition	innovations & solutions
Devro Pty Ltd	Foodservice & Industrial Division	KPMG
Dole Australia	Novartis Consumer Health	Lawson Software
DSM Food Specialties Australia Pty Ltd	Australasia Pty Ltd	Legal Finesse
DSM Nutritional Products	Nutricia Australia Pty Ltd	Linfox Australia Pty Ltd
Earlee Products	Ocean Spray International, Inc	Logistics Bureau Pty Ltd
Ferrero Australia	Parmalat Australia Limited	Meat and Livestock Australia Limited
Fibrisol Services Australia Pty Ltd	Patties Foods Pty Ltd	Monsanto Australia Limited
Fonterra Brands (Australia) Pty Ltd	Peanut Company of Australia Limited	PricewaterhouseCoopers
Foster's Group Limited	Procter & Gamble Australia Pty Ltd	Promax Applications Group Pty Ltd
Frucor Beverages (Australia)	Gillette Australia	SAP Australia Pty Ltd
General Mills Australia Pty Ltd	PZ Cussons Australia Pty Ltd	Sue Akeroyd & Associates
George Weston Foods Limited	Quality Ingredients Limited	Supply Chain Consulting Pty Ltd
AB Food and Beverages Australia	Prima Herbs and Spices	Swire Cold Storage
AB Mauri	Reckitt Benckiser (Australia) Pty Ltd	Swisslog Australia Pty Ltd
Cereform/Serrol	Ridley Corporation Limited	Touchstar Pacific Pty Ltd
Don	Cheetham Salt Limited	Touchstone Cons. Aust Pty Ltd
GWF Baking Division	Sanitarium Health Food Company	Visy Pak
George Weston Technologies	Sara Lee Australia	Wiley & Co Pty Ltd
Jasol	Sara Lee Foodservice	
Weston Cereal Industries	Sara Lee Food and Beverage	
GlaxoSmithKline Consumer Healthcare	SCA Hygiene Australasia	PSF members
Golden Circle Limited	Schwarzkopf and Henkel	Amcor Fibre Packaging
Goodman Fielder Limited	Sensient Technologies	J Boag and Son Brewing Limited
Meadow Lea Australia	Simplot Australia Pty Ltd	Bundaberg Brewed Drinks Pty Ltd
Quality Bakers Australia Pty Ltd	Specialty Cereals Pty Ltd	Cadbury Schweppes Asia Pacific
Green's Foods Limited	Spicemasters of Australia Pty Ltd	Coca-Cola Amatil (Australia) Limited
H J Heinz Company Australia Limited	Stuart Alexander & Co Pty Ltd	Foster's Group Limited
Hans Continental Smallgoods Pty Ltd	Sugar Australia Pty Ltd	Golden Circle Limited
Harvest FreshCuts Pty Ltd	SunRice	Lion Nathan Limited
Heimann Foodmaker Group	Swift Australia Pty Ltd	Owens Illinois
Hoyt Food Manufacturing Industries Pty Ltd	Symrise Pty Ltd	Visy Pak
J Boag and Son Brewing Limited	Tate & Lyle ANZ	
Johnson & Johnson Pacific Pty Ltd	Tetley Australia Pty Ltd	
Pfizer Consumer Health	The Smith's Snackfood Co	
Kellogg (Australia) Pty Ltd	The Wrigley Company Pty Ltd	
Day Dawn Pty Ltd	Unilever Australasia	

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