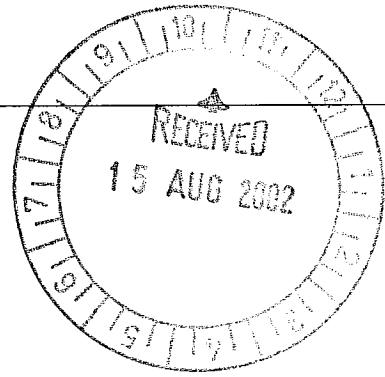
SUBMISSION

AUSTRALIAN
FOOD AND GROCERY
COUNCIL



ACKNOWLEDGED

Submission to

Food Standards Australia New Zealand

in response to:

Proposal P235 – Review of Food Type Dietary Supplements

August 2002

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1 EXECUTIVE SUMMARY

The Australian Food and Grocery Council (AFGC) strongly supports the correction of inequities between the regulation of dietary supplements, for which there is no food standard in Australia and which are regulated in New Zealand under the New Zealand Dietary Supplement Regulations 1985 (NZ DSR), but notes that this Proposal is dependent on regulatory action being taken in New Zealand to revoke or amend the NZ DSR.

The AFGC further notes the distinction that FSANZ draws between food type dietary supplements and therapeutic type dietary supplements (currently regulated in Australia as complementary medicine.

The AFGC recommends that the approach to be taken to this standard should be based on it applying to foods designed as a supplement to the food supply and not as a food *per se*. A food has been defined as "primarily consumed to provide nourishment, nutrition or hydration or to satisfy hunger, thirst or a desire for taste, texture or flavour".

The AFGC does not consider that examples of dietary supplements currently available on the market meet the criteria of a food and considers that food type dietary supplements are best described by their intended function and the substances that make them up, and should be considered as a supplement to the food supply.

The AFGC considers that the intended function of food type dietary supplements is to supplement the food supply in the context of a claim about health.

FSANZ asks whether food type dietary supplements could be managed through the standard for special purpose foods or through the novel food standard. Special purpose foods are defined as "foods that are specially processed or formulated to satisfy particular dietary requirements that exist because of a particular physical or physiological need". The AFGC does not consider that this standard serves the intent of food type dietary supplements.

The novel foods standard defines a novel food to mean a non-traditional food for which there is insufficient knowledge in the broad community to enable safe use in the form or context in which it is presented. The AFGC does not consider that this serves the intent of food type dietary supplements, acknowledging, however, that from time to time certain ingredients which form part of food type dietary supplements may well need to meet the requirements of the novel foods standard.

The AFGC recommends that, to meet the intended function and purpose of a food type dietary supplement, a specific standard is required.

1.1 Policy Principles

Throughout the Proposal, FSANZ makes reference to a number of policy principles. As matters of policy are now determined by the Ministerial Council on the advice of the Food Regulation Standing Committee, the AFGC considers that such advice should be sought on the following policy principles.

FSANZ notes (p. 21) that it operates within a traditional nutrition paradigm that has as its basis dietary adequacy (which includes essentiality) to support physiological growth, development and maintenance of health. FSANZ further notes (p. 19) that food type dietary supplements represent a significant shift from these current nutrition principles applied to general purpose foods. It further notes that these principles have already been "breached" within

other sections of the Food Standards Code – notably formulated caffeinated beverages standard, where a risk-based approach has been adopted.

The Ministerial Council decision in May 2002 was to use a risk-based approach for the policy underpinning health and nutrient claims It would seem appropriate that the policy basis for all food standards be re-evaluated for their suitability to be managed by a sound, scientific, risk-based approach. The AFGC recommends a review be sought from the Food Regulation Standing Committee on the policy basis for all food standards.

Notwithstanding the general principles review, the AFGC considers that the policy approach adopted for food type dietary supplements should be risk-based through the use of compositional safety assessments and labelling provisions as a risk management tool (similar to that taken for formulated caffeinated beverages).

The AFGC recommends that policy direction of this nature be sought from the Food Regulation Standing Committee. Under such a risk management approach, some botanicals in the form of food type dietary supplements may require maximum allowable quantity restrictions in foods or, in some cases, advisory labelling statements.

The AFGC, in previous submissions, has drawn attention to the anomalies in the standard for the addition of vitamins and minerals to general purpose foods – in particular, the inequities in the permitted additions to categories of foods.

In considering food type dietary supplements the AFGC recommends that advice be sought from the Ministerial Council on the appropriateness of the policy principles currently underpinning the vitamins and minerals standard, and the likely need for a review of that standard.

1.2 Regulatory Considerations

The AFGC considers that regulation of food type dietary supplements should apply a system of controls that aims to manage the risk associated with the safety of these foods and the claims made about them. The regulatory framework should be designed to manage the risk in a way that is efficient and cost-effective, does not impose inappropriate compliance costs on the industry, and does not unnecessarily restrict the range of products consumers are able to access.

The AFGC considers the likely types of risks associated with food type dietary supplements are three in number:

- risks associated with the ingredients used in the product;
- risks associated with inadequate consumer access to information; and
- risks associated with claims made about the products.

Management of these risks could be through a number of mechanisms. Ingredients intended for use in a food type dietary supplement could be managed through an inclusion list and an exclusion list.

- Nutritive substances such as vitamins and minerals and non-culinary botanicals with a known existing safety profile (low risk substances) could be placed on the inclusion or positive list for use in FTDS.
- Nutritive substances of a novel nature could pass through the Novel Food Standard for safety assessment before being made available on the positive list.

- Where safety concerns emerge as a result of new scientific information or through the widespread use of these low risk substances within the community, the substance concerned could be placed on the exclusion list or further restricted by the use of labelling statements on the product concerned.
- Risks associated with inadequate consumer access to information could be managed through appropriate labelling provisions.
- Risks associated with claims made about products could be managed by placing controls on the sort of claims that can be made and the level of evidence that is required to substantiate such claims. Claims could generally be categorised by the degree of promise they offer to the consumer – the higher the level of claim, the greater the level of regulatory scrutiny required following the principles established by the Health Ministers in May 2002.

The AFGC recommends that food type dietary supplements should be labelled "Dietary supplement" so that the consumer understands these are intended as a supplement to the normal diet.

The AFGC recommends that substances currently approved for use as listable ingredients in complementary medicines under the Australian Register of Therapeutic Goods (ARTG), and which therefore have undergone a safety assessment, should be permitted for use without further assessment.

The AFGC contends that the purpose behind a food type dietary supplement is as a supplement to the normal diet with an intended function that encompasses health claims. A health claim requires that it should be truthful, valid, not misleading, and capable of substantiation. As such, the supplement or the ingredient contained in the supplement about which a claim was made would have to be present in an amount that supported the claim made, but not necessarily in relation to an RDI, should one be available.

The AFGC recommends that labelling a food as a dietary supplement should not trigger the requirement for an advisory statement around the health claim to the effect that the food needs to be consumed in the context of the total diet, given the food is labelled a supplement to the diet.

The AFGC considers that any risks arising from inappropriate use of food type dietary supplements could be addressed in the context of labelling and the use of advisory statements, bearing in mind the intended purpose of food type dietary supplements and their function as a supplement to the food supply.

The AFGC recommends that a new standard be developed, with cessation of provision for production or importation of food type dietary supplements under the NZ DSR.

The AFGC considers that until a decision is made on Proposal P234, which relates to the Code of Practice on Nutrient Claims, any decision on a voluntary code of practice relating to food type dietary supplements is not possible. The AFGC remains committed to minimum effective regulation at least cost to industry, and is supportive of self-regulation and codes of practice where these achieve the cited objectives.

Given the intent and purpose of food type dietary supplements, the AFGC considers the key to any standard will be enforcement around any claims made. The AFGC recommends that the jurisdictions responsible for enforcement be fully committed to this action when such a standard is promulgated.

1.3 Conclusions

The AFGC welcomes the opportunity to comment on this Proposal and notes that its progress is conditional on a number of other proposals currently in the system, most notably those related to health claims, the adequacy of current policy underpinning the addition of vitamins and minerals to general purpose foods, and the need for New Zealand to repeal certain legislation.

2 THE AUSTRALIAN FOOD AND GROCERY COUNCIL

The Australian Food and Grocery Council (AFGC) makes this submission to Food Standards Australia New Zealand in response to the request for comment on Proposal P235 – *Review of Food Type Dietary Supplements.*

The AFGC is the peak national organisation representing Australia's packaged food, drink and grocery products industry.

The membership of the AFGC comprises more than 185 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 at *Appendix 1.*) 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 an annual turnover in excess of $54 billion and employs 165,000 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.

3 SPECIFIC COMMENTS ON THE PROPOSAL

3.1 Existing Regulatory Framework (section 2.4)

FSANZ sets out the regulatory framework currently underpinning the Food Standards Code and suggests that food type dietary supplements challenge this framework, claiming lack of data on many of the substances involved, potential high levels of exposure, and difficulties with identifying "precedents" against which permissions may be assessed.

The AFGC considers that, while this may represent a challenge, a risk-based assessment framework that included appropriate labelling provisions should be able to permit food type dietary supplements to be marketed, providing consumers with further choice within a safe food supply.

Indeed, FSANZ acknowledges that in establishing the formulated caffeinated beverages standard it has successfully managed a significant paradigm shift from the current nutritional principles applied to general purpose foods in the Food Standards Code.

The AFGC recommends that the policy principles underpinning general purpose foods should be reconsidered in light of developments such as food type dietary supplements and formulated caffeinated beverages, and advice sought from the Ministerial Council in this regard.

3.2 Addition of Nutritive Substances (section 2.4.1)

FSANZ draws attention to the current standard for the addition of vitamins and minerals to general purpose foods and notes the principles generally applied in this area – that is:

1 restoration (to moderate fortification levels);

2 nutritional equivalence of substitute foods;

3 fortification (to address public health need); and

4 ensuring the appropriate nutrient composition of a special purpose food.

The AFGC, in previous submissions, has drawn attention to the anomalies in the standard for the addition of vitamins and minerals to general purpose foods – in particular, the inequities in the permitted additions to categories of foods.

In considering food type dietary supplements the AFGC recommends that advice be sought from the Ministerial Council on the appropriateness of the policy principles currently underpinning the vitamins and minerals standard, and the likely need for a review of that standard.

In discussing the addition of nutritive substances and its application to food type dietary supplements, FSANZ notes that the NZ DSR does not specify minimum levels of vitamins and minerals required in dietary supplements although maximum limits are specified for some vitamins and minerals. FSANZ further notes that this is significantly different from Volume 2 of the Food Standards Code where such substances can be added only where there is positive permission to do so. FSANZ specifically invites comment on the relevance of current FSANZ policy on the addition of vitamins and minerals and the appropriateness of the current permissions in the New Zealand DSR for nutritive substances.

The AFGC considers that safety should be the primary requirement for the addition of these substances to food type dietary supplements. If it is safe to do so, then permission should be given. Concerns over excessive consumption or "distortion of the food supply" can be addressed by labelling provisions, and the **AFGC recommends that food type dietary supplements should be labelled "Dietary supplement" so that the consumer understands these are intended as a supplement to the normal diet.**

The recent directive of the EU relating to food supplements, designated for vitamins and minerals only (Directive 2002/46/EC), notes that food supplements are purchased by consumers for supplementing intakes from the diet.

3.3 Special Purpose Foods (section 2.4.2)

FSANZ asks for comments on food type dietary supplements as special purpose foods. The definition of special purpose food is "foods that are specially processed or formulated to satisfy particular dietary requirements that exist because of a particular physical or physiological need".

The AFGC considers that food type dietary supplements have a purpose and intent which differs from that articulated for special purpose foods. Their purpose is as a supplement to the diet with the intent to make a health claim. **The AFGC therefore considers that food type dietary supplements do not meet the purpose or intent of special purpose foods and would not fit within the existing standard.**

3.4 Formulated Caffeinated Beverages (section 2.4.3)

FSANZ notes that decisions relating to the management of food type dietary supplements may impact on the formulated caffeinated beverages standard.

The AFGC recommends that the risk management principles established for managing formulated caffeinated beverages are appropriate for the management of food type dietary supplements.

FSANZ further asks whether relevant permissions for food type dietary supplements should be made applicable to all foods (that is, horizontal permissions) or be regulated through a specific standard.

The AFGC recommends that, given the intent and purpose of food type dietary supplements being a supplement to the food supply and intended to carry a health claim, they should be managed through the establishment of a separate standard.

FSANZ further asks what are the distinguishing characteristics that should be taken into account in order to clearly distinguish between foods and medicines – in particular, complementary medicines and food type dietary supplements.

The AFGC considers the likely differentiation would be around the form, function and type of claims permitted. In general, a food type dietary supplement would not be presented:

- in a form that indicated a medicine – that is, tablet, capsule or pill; or
- with labelling that included dosage instructions; or

- advice requiring medical or health professional information being required before consumption; or
- with label claims relating to prevention, management, cure or treatment of disease.

3.5 Novel Foods (section 2.4.4)

FSANZ asks whether aspects of the novel foods standard should apply to food type dietary supplements given that the purpose of the novel foods standard is to ensure that non-traditional foods which may have characteristics that raise safety concerns will undergo a risk-based assessment before they are offered for retail sale in Australia and/or New Zealand. FSANZ uses as example colostrum, chitosan, chlorella and hydroxycitric acid as potential ingredients in food type dietary supplements which may require assessment for safety due to their novel nature.

The AFGC considers there may well be some ingredients that are novel and require safety assessment under the novel foods standard. **However, the AFGC recommends that substances currently approved for use as listable ingredients in complementary medicines under the Australian Register of Therapeutic Goods (ARTG), and which therefore have undergone a safety assessment, should be permitted for use without further assessment.**

3.6 Botanicals and Natural Toxicants (section 2.4.5)

FSANZ raises the question as to the safety of certain botanicals and the likely presence of natural toxicants but notes that many have received permissions for use in complementary medicines although not been assessed for safety as food ingredients. A further concern expressed is that of misidentification of botanicals and the consequent health risk should they be incorporated into food type dietary supplements.

The AFGC considers this risk is no greater in food than for complementary medicines and could be managed through a requirement for good manufacturing practice of the botanical concerned, appropriate use of maximum permitted additions to food type dietary supplements, and reference to the register of listable ingredients maintained under the ARTG by the Therapeutic Goods Administration (TGA).

Notwithstanding this, there will be on occasion ingredients in food type dietary supplements which remain novel and require safety assessment through the novel foods standard process.

3.7 Food Additives and Processing Aids (section 2.4.6)

The AFGC agrees that food additives and processing aids that are included in the respected (horizontal) standards in Volume 2 would be applicable to any standard addressing food type dietary supplements in Volume 2.

The AFGC further agrees that pre-market approval would need to be sought for any other additives or processing aids not already included in Standards 1.3.1 and 1.3.3.

FSANZ asks a series of questions on added substances, particularly with reference to Figure 2, "Conceptualisation of Risk Assessment Based Framework that Currently Supports the Food Standards Code".

The AFGC has argued that food type dietary supplements should be considered according to their purpose and function, being designed as a supplement to the food supply. This will necessitate a modification to the decision tree category "Traditionally and broadly recognised as foods in New Zealand and Australia".

As a dietary supplement is supplemental to the food supply, it is possible it will contain ingredients that have been traditionally and broadly recognised in New Zealand and Australia but not necessarily as foods. This would modify the column headed "Substances for deliberate addition" such that there would be a "yes" path for certain substances that were traditionally and broadly recognised in New Zealand and Australia for supplemental use. This could likely cover a number of non-culinary botanicals which currently have a tradition of use as complementary medicines, and which would be safe for use as a food type dietary supplement.

FSANZ asks whether permissions for food type dietary supplements should include single ingredient foods and use as examples barley wheat grass powders, conjugated linoleic acid, and creatine. FSANZ further asks whether food type dietary supplements be generally permitted to be a mixture of foods or whether there are particular foods that should be excluded from mixing with food type dietary supplements.

The AFGC recommends that if they are safe, then they should be permitted as single ingredient dietary supplements or as a mixture of foods. The AFGC recommends that should there be mixing of food type dietary supplements ingredients with other foods, then the mixed food should conform to the food type dietary supplements standard.

FSANZ asks should some food type dietary supplements be grandfathered and, if so, what would be the determining criteria.

The AFGC considers that if they are currently on the market, they are safe and, if so, should be permitted to remain on the market. It may be that in formulating a food type dietary supplement standard certain foods currently recognised as falling into this category may be judged to have insufficient evidence to support any claims made about them, in which case it may be necessary to remove such foods from the market in an orderly manner. Determination of this will be dependent on the outcome of the Proposal on health and related claims (P153).

3.8 Labelling and Claims (section 2.6.7)

The AFGC has indicated in its response to Proposal P153 and in reference to Figure 3, that nutrition function claims and enhanced function claims should be a single box under "Nutrition Claims" and that health claims should relate to risk reduction claims on the principle that reducing the number of "boxes" decreases the likelihood of boundary issues in assessing a claim.

FSANZ argues for the conceptual framework around nutrition claims being applied to food type dietary supplements and questions whether criteria can be set for a nutrition claim on a food type dietary supplement if there is no RDI or estimated safe daily dietary intake.

The AFGC contends that the purpose behind a food type dietary supplement is as a supplement to the normal diet with an intended function that encompasses health claims. A health claim requires that it should be truthful, valid, not misleading, and capable of substantiation. As such, the supplement or the ingredient contained in the supplement about which a claim was made would have to be present in an amount that supported the claim made, but not necessarily in relation to an RDI, should one be available.

The AFGC recommends that labelling a food as a dietary supplement should not trigger the requirement for an advisory statement around the health claim to the effect that the food needs to be consumed in the context of the total diet, given the food is labelled a supplement to the diet.

The AFGC recommends that any risks arising from inappropriate use of food type dietary supplements could be addressed in the context of labelling and the use of advisory statements, bearing in mind the intended purpose of food type dietary supplements and their function as a supplement to the food supply.

FSANZ asks a series of questions on labelling.

The AFGC recommends the use of a label statement to the effect that this is a dietary supplement would be sufficiently informative to advise the public of the nature of the product. As a general principle, and from a food safety point of view, the AFGC considers allergen labelling should be a requirement on all food type dietary supplements.

An appropriate risk management strategy could include:

- additional advisory or warning statements relating to vulnerable groups
- the use of a positive list of permitted substances under the food type dietary supplements standard; and
- reference to those ingredients already maintained on the ARTG as listable ingredients.

The AFGC does not consider that dosage is an appropriate labelling instruction for a food type dietary supplement, as this is clearly medicinal in nature and such labelling should render the product a medicine and subject to TGA regulation.

3.9 The Regulatory Problem (section 2.5)

In preparing the Proposal FSANZ places particular emphasis on:

- public health and safety,
- provision of information to consumers to enable informed choice,
- prevention of misleading conduct, and
- the need for risk based analysis, and fair trading of foods between Australia and New Zealand.

The AFGC considers that Option 1 – the *status quo* – does not meet the objectives that FSANZ has set for itself, and should not be considered further.

Option 2 is full regulation, with suggestions that a horizontal approach could be taken, which would involve reviewing and amending all current Standards or, alternatively, a vertical approach – that is, to develop a new Standard category.

The AFGC considers that, given the arguments presented earlier in this submission concerning the purpose and function of food type dietary supplements, it would not be possible to take the horizontal approach.

The AFGC recommends that a new standard be developed, with cessation of provision for production or importation of food type dietary supplements under the NZ DSR.

FSANZ asks whether a co-regulatory approach could be taken to the management of food type dietary supplements.

The AFGC considers that until a decision is made on Proposal P234, which relates to the Code of Practice on Nutrient Claims, any decision on a voluntary code of practice relating to food type dietary supplements is not possible. The AFGC remains committed to minimum effective regulation at least cost to industry, and is supportive of self-regulation and codes of practice where these achieve the cited objectives.

3.10 Impact Analysis

The AFGC considers the major impact of a standard for food type dietary supplements will be to correct an inequity of trade between Australia and New Zealand that is currently permitted under the NZ DSR. To be effective, any such standard would require that production or importation of food type dietary supplements under the NZ DSR should cease. The presence of a food type dietary supplements standard will also increase opportunities for export to markets such as South-East Asia.

The AFGC considers that the impact on consumers and the community of a food type dietary supplements standard, which at the same time removes the importation of such foods under the NZ DSR, will be to provide them with further opportunities to make informed choices based on accurate and adequate information when purchasing such products.

FSANZ asks a series of questions on regulatory options. While not having the detailed information, the AFGC considers that a food type dietary supplements standard will level the playing field between Australia and New Zealand to the benefit of Australian industry and will increase the potential for consumers to have access to reliable and accurate information on food type dietary supplements.

The AFGC remains committed to the concept of self-regulation where it delivers minimum effective regulation. The AFGC's preferred regulatory option is for a fully regulated vertical standard as part of Volume 2 of the Food Standards Code but considers that, given the purpose and likely function of a food type dietary supplement, resolution of the Proposal relating to health claims needs to be progressed before finalising a decision on food type dietary supplements. Decisions on health claims and their regulations will, in part, determine the AFGC position on full or co-regulation for food type dietary supplements.

4 CONCLUSION

The AFGC welcomes the opportunity presented by Proposal P235 to review food type dietary supplements as it provides the opportunity to correct an anomaly in trade between Australia and New Zealand produced by the differing regulatory environment around foods defined as nutritional supplements.

The AFGC considers that consumers have an expectation that food type dietary supplements they purchase will be safe. They have a right to expect that the product they purchase will meet certain standards such as containing the stated amounts of ingredients as shown on the label, not containing other unnamed and potentially harmful ingredients, being manufactured under appropriate conditions with adequate controls on the ingredients in the final product, being free from harmful levels of contaminants, being labelled with sufficient information to enable them to make an informed decision about using the product, and carrying information about the benefits of the product that are truthful, based on sound evidence and not exaggerated.

Consumers may be put at risk if any of these expectations are not met. The level of risk will vary and will depend on a number of factors. Regulation of food type dietary supplements should apply a system of controls that aims to manage the risk associated with the safety and quality of those foods and the claims made about them. The regulatory framework should be designed to manage the risks in a way that is efficient and cost–effective, does not impose inappropriate compliance costs on the industry and does not unnecessarily restrict the range of products consumers are able to access.

The AFGC considers that types of risks associated with food type dietary supplements are three in number:

- risks associated with the ingredients used in the product;
- risks associated with inadequate consumer access to information; and
- risks associated with the claims made about the product.

Management of these risks could be through a number of mechanisms. Ingredients intended for use in food type dietary supplements could be managed through an inclusion list and an exclusion list.

- Nutritive substances such as vitamins and minerals and non-culinary botanicals with a known existing safety profile (low risk substances) could be placed on the inclusion or positive list for use in food type dietary supplements.
- Nutritive substances of a novel nature could pass through the Novel Food Standard for safety assessment before being made available on the positive list.
- Where safety concerns emerge as a result of new scientific information or through the widespread use of these low risk substances within the community, the substance concerned could be placed on the exclusion list or further restricted by the use of labelling statements on the product concerned.
- Risks associated with inadequate consumer access to information could be managed through appropriate labelling provisions.
- Risks associated with claims made about products could be managed by placing controls on the sort of claims that can be made and the level of evidence that is required to substantiate such claims. Claims could generally be categorised by the degree of promise they offer to the consumer – the higher the level of claim, the greater the level of regulatory scrutiny required.

Given the intent and purpose of food type dietary supplements, the AFGC considers the key to any standard will be enforcement around any claims made. The AFGC considers it is important that the jurisdictions responsible for enforcement are fully committed to this action when such a standard is promulgated.

APPENDIX 1: AFGC MEMBERSHIP LIST

MEMBERSHIP

As At 12/8/02

AUSTRALIAN
FOOD AND GROCERY
COUNCIL

AAB Holdings Pty Ltd
Ardmona Foods Ltd
Arnott's Biscuits Ltd
  The Kettle Chip Company Pty Ltd
Asia-Pacific Blending Corporation Pty Ltd
Australia Meat Holdings Pty Ltd
Australian Pacific Paper Products
Beak & Johnston Pty Ltd
BOC Gases Australia Ltd
Bonland Dairies Pty Ltd
Boots Healthcare Australia Pty Ltd
Bronte Industries Pty Ltd
Buderim Ginger Ltd
Bundaberg Sugar Ltd
Cadbury Schweppes Asia Pacific
Campbell Australasia Pty Ltd
Campbell Brothers Ltd
Cantarella Bros Pty Ltd
Carter Holt Harvey Tissue Aust Pty Ltd
Cascade Beverage Co
Cerebos (Australia) Ltd
Chr Hansen Pty Ltd
Christie Tea Pty Ltd
Clorox Australia Pty Ltd
Coca-Cola Amatil Ltd
Colgate-Palmolive Pty Ltd
Consolidated Foods Australia Ltd
Coopers Brewery Ltd
Cussons Pty Ltd
Dairy Farmers
Darling Downs Bacon Co-operative
  Association Ltd
Demicombe Pty Ltd
Derby Industries Pty Ltd
Devro-Teepak Pty Ltd
Douwe Egberts
Dragoco Australia Pty Ltd
DSM Food Specialties Australia Pty Ltd
Effem Foods Pty Ltd
  Mars Confectionery of Australia
  Master Foods of Australia
  Uncle Ben's of Australia
Faulding Healthcare Pty Ltd
Fibrisol Services Australia Pty Ltd
Firmenich Limited
Fletchers Foods Pty Ltd
General Mills Australia Pty Ltd
George Weston Foods Ltd
  Allied Foods Co Ltd
  Baking Division
  Biscuit & Cake Division
  Meat & Dairy Division
  Weston Bioproducts
  Weston Cereal Industries
  Weston Technologies
Gillette Australia Pty Ltd
GlaxoSmithKline
Golden Circle Ltd
Goodman Fielder Ltd
  GF Food Services
  GF Ingredients Group
  GF International
  Goodman Fielder Milling & Baking Group
  Bunge Defiance Pty Ltd
  Goodman Fielder Mills Ltd
  Leiner Davis Gelatin (International)
  Meadow Lea Foods
  Quality Bakers Australia Ltd
  Serrol Ingredients
  Starch Australasia Ltd
  The Uncle Toby's Co Ltd
Green's Foods Ltd
H J Langdon & Co Pty Ltd
Hans Continental Smallgoods Pty Ltd
Harvest FreshCuts Pty Ltd
Heimann Foodmaker Group
Heinz Wattie's Australasia
  Southern Country Foods Pty Ltd
Henry Jones Foods Pty Ltd
Herron Pharmaceuticals Pty Ltd
Hoyt Food Manufacturing Industries Pty Ltd
International Flavours & Fragrances
  (Australia) Pty Ltd
Johnson & Johnson Pacific Pty Ltd
Kellogg (Australia) Pty Ltd
  Day Dawn Pty Ltd
Kimberly-Clark Australia Pty Ltd
Kraft Foods Ltd
La Famiglia Fine Foods Pty Ltd
Madura Tea Estates
Manildra Harwood Sugar
McCormick Foods Australia Pty Ltd
Merisant Manufacturing Australia Pty Ltd
National Foods Ltd
Nerada Tea Pty Ltd
Nestlé Australia Ltd
  Nestlé Beverages Division
  Nestlé Confectionery Division
  Nestlé Dairy Products Division
  Nestlé Foods Division
  Friskies Pet Care Division
  Foodservice & Industrial Division
Novartis Consumer Health Australasia Pty Ltd
NutraSweet Australia Pty Ltd
Nutricia Australia Pty Ltd
Nutrinova (Australasia) Pty Ltd
Ocean Spray International, Inc
OSI International Foods Australia Pty Ltd
P B Foods Ltd
Paper Converting Co Pty Ltd
Patties Bakery Pty Ltd
Peanut Company of Australia Ltd
Pfizer Warner Lambert Consumer Group
Procter & Gamble Australia Pty Ltd
Quality Ingredients Ltd
Quest International Australasia Ltd
Reckitt Benckiser
Regal Cream Products Pty Ltd
Ridley Corporation Ltd
  Cheetham Salt Limited
Roche Vitamins Australia Pty Ltd
S C Johnson & Son Pty Ltd
Sanitarium Health Food Company
  Longa Life Vegetarian Products Pty Ltd
Sara Lee Bakery (Australia) Pty Ltd
Schwarzkopf and Henkel
Sensient Technologies Australia Corp Pty Ltd
Simplot Australia Pty Ltd
Snack Foods Ltd
Specialty Cereals Pty Ltd
Spicemasters of Australia Pty Ltd
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CROSSMARK Asia/Pacific
Ernst & Young
Food Liaison Pty Ltd
Foodbank Australia Limited
Freehills
HAHT Commerce Pty Ltd
innovations & solutions
KPMG Chartered Accountants
KPMG Consulting International
Linfox Australia Pty Ltd
Manassen Foods Australia Pty Ltd
Meat and Livestock Australia Ltd
Michels Warren
Monsanto Australia Ltd
Mayne Logistics Pty Ltd
Novozymes Australia
OTS Appointments
PricewaterhouseCoopers
PwC Consulting
Protein Technologies International Aust Pty Ltd
Queensland Sugar
Ronald L Cossen & Associates Pty Ltd
Strategic Horizons Pty Ltd
TMP Worldwide eResourcing Ltd
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