LION

Lion – Response to Questions on Notice:
Senate Select Committee on Australia's Food Processing Sector

14 March 2012

Lion Questions on Notice

Question one – page 51

CHAIR: In the context of the food safety regulation process, you mentioned that in your submission. What are your concerns on how the food safety code might be improved?

Response

- From a food safety regulation process perspective there is little concern with the code itself. Most issues we have experienced are with the implementation of the Code by the various Food Safety Regulators across the country.
- Specifically they all operate under different State based legislation which requires them to approve "Food Safety Programs" as defined by the Food Standards Code. However, for businesses that operate multiple sites in multiple states that are trying to develop and implement consistent programs (policies & procedures) we often experience inconsistent interpretations and requirements from these regulators.
- This occasionally results in varying requirements in the food safety program before approval, which is difficult, time consuming and sometimes costly to get the consistency required. Please refer to the example we provided in our submission which outlined the scenario we face in getting a Dairy Farm Food Safety program approved by 5 different State Food Safety Regulators for use across Australia.
- Lion suggests that Government consider developing an improved and expanded user guide to ensure it is being interpreted consistently by the various regulators within the food processing sector.

Question 2-3: provided in separate document to committee

Question four – page 53

Senator EDWARDS: I just noticed in your submission that you have a reference to AQIS. Would you like to expand further on that? It sort of seems a bit restrained in your submission. I know you are a big company and you are sensitive to all of the political issues and everything like that, but could you be a bit more effusive as to perhaps some constructive observations on AQIS at the moment and where you see it and what would be helpful in terms of any messages to take back to Canberra?

Response

- We do not have any further specific comments in relation to this question. Generally AQIS often add unnecessary complexity and duplication with regulations for manufacturers when ideally specific export requirements could be managed by the existing and relevant state food authorities.
- Please see our original submission for further information.

Question five – page 53

Senator EDWARDS: [...] Do you still believe that AQIS is serving a reasonable purpose in accessing markets offshore?

Response

- Given the short shelf life of fresh white milk, we are limited by what we can do in the export market and as such our current focus is on the domestic market.
- For this reason we do not have any specific comments to make in response to this question.

Question six – page 54

CHAIR: I understand that very well. But it provides us with the opportunity to get a perspective from you, who have a footprint in a couple of markets within the food processing sector. Whether you want to call beer a food is another question. But you are still manufacturing a product, and I would have thought that there would be a lot of common principles across those markets—some of the regulatory duplication issues you might find, for example. Transport, workforce management issues and those sorts of things would also give the capacity for comparisons that might provide us with some thoughts on how we can look at the overall framework in a policy development sense.

Response

- As disclosed in our submission, our business faces a number of challenges relating to regulatory duplication and some of these are certainly common across both sides of our organisation.
- Areas of regulatory burden affecting both sides of our business as referenced in our submission include those relating to container waste management, food labelling, preventative health and environmental requirements, as well as the proposed carbon price mechanism.
- A key area of cross-jurisdictional regulations, or regulatory duplication issues common to both sides of our business is in environment where high levels of overlap and duplication within the environmental regulatory space at a State and Federal Government level is impacting on the delivery of greater efficiencies across the supply chain.
- Occupational Health & Safety is another issue we touched on in our submission which requires our business to deal with eight Health & Safety Acts & Regulations.