



AUSTRALIAN
FOOD AND GROCERY
COUNCIL

SUBMISSION

SUBMISSION TO

The Treasury,
Competition and Consumer Policy Division

IN RESPONSE TO

Issues Paper - Unit Pricing

10 October 2008

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 A.) The AFGC represents the nation's largest manufacturing sector. By any measure Australia's food, drink and grocery products industry is a substantial contributor to the economic and social welfare of all Australians. Effectively, the products of AFGC's member companies reach every Australian household.

The industry has annual sales and service income in excess of \$70 billion and employs more than 200 000 people – almost one in five of the nation's manufacturing workforce. Of all Australians working in the industry, half are based in rural and regional Australia, and the processed food sector sources more than 90 per cent of its ingredients from Australian agriculture.

The AFGC's agenda for business growth centres on public and industry policy for a socioeconomic environment conducive to international competitiveness, investment, innovation, employment growth and profitability.

The AFGC's mandate in representing member companies is to ensure a cohesive and credible voice for the industry, to advance policies and manage issues relevant to the industry and to promote the industry and the virtues of its products, enabling member companies to grow their businesses.

The Council advocates 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.

1 COMMENT ON APPLICATION

The Australian Food and Grocery Council (AFGC) welcomes this opportunity to make a submission to The Treasury, Competition and Consumer Policy Division, in response to the Issues Paper on Unit Pricing.

1.1 POLICY AND PRINCIPLES

The AFGC notes that Government policy is for minimum effective regulation, a policy that is fully endorsed by the AFGC, and that this is reflected in the competition policy principles adopted by the Council of Australian Governments.

The AFGC position is to support the imposition of regulation only to ensure that minimum necessary standards are maintained and only where necessary to avoid market failure. The broad principles supporting consumer rights and consumer protection are already established under fair trading laws, and regulation should only be imposed to provide additional detail and clarity to the intent of the law where there is a demonstrated market failure.

The AFGC notes that the imposition of regulation can significantly impact on the food industry not only in the production and processing areas, but also across the supply chain. Consistent, national regulatory frameworks blending regulation with appropriate self and co-regulation are key to avoiding adding unnecessary costs, leading to heightened industry efficiency, competition and innovation.

1.2 INDUSTRY CODES OF PRACTICE

Industry Codes of Practice are a well accepted form of regulatory measure which can raise industry standards over and above that of black letter law¹. In doing so they can benefit:

- consumers, by providing a framework which allows industry to be more responsive their needs than full regulation would allow, whilst still providing high levels of protection;
- regulators, by removing substantial enforcement and monitoring costs thereby freeing up resources which can be directed to more pressing and more serious issues; and,
- industry, through certainty and a level playing field to operate which encourages better business practices.

Codes of Practice may be developed which are entirely voluntary and administered through an industry association, such as the National Retail Association (NRA) as the industry organisation providing professional services to the retail and wider service industry throughout Australia.

Alternatively, Codes of Practice could be developed under co-regulatory models and jointly administered with industry and regulators.

¹ Graeme Samual, Chairman ACCC. Centre for Corporate Public Affairs 2003 Oration.

An alternative approach would be to consider the development of guidelines, similar to those developed by the Australian Consumer and Competition Commission (ACCC) in defining 'safe harbour' provisions for country of origin labelling. Under these guidelines the ACCC has advised industry of their obligations for due diligence and the manner in which compliance with Trade Practices legislation is to be demonstrated.

2 SPECIFIC COMMENTS ON THE DISCUSSION PAPER

2.1 UNIT PRICING – A GENERIC RETAIL ISSUE

Unit pricing is intended to provide consumers with information on the price per unit quantity of a product to facilitate a direct price comparison to be made with the same or similar products irrespective of the size of container. In providing consumers with this information it is intended to ensure that consumers are not misled by factors such as size, shape or colour of the container in which the product is sold or any claims made about the product such as "extra value" or "special" etc.

The AFGC notes that unit pricing is already provided by retail outlets in areas which such information is critical to consumer purchasing decisions. Food products sold loose are already unit priced e.g. fruit and vegetables, meat, processed meat and confectionery. Similarly pre-packed "random weight" foods such as meat and cheese are also marked in this way, as are a range of unpackaged products sold through the delicatessen.

While unit pricing may address fair trading and prevention of misleading conduct, it impacts on the sale of all items at the retail level, not just food. It is relevant to all retail transactions such as non-food grocery items (toothpaste, household cleaners, washing powders, clingwrap, garbage bags, tampons, vitamin pills, nappies, cosmetics, pharmaceutical items, etc.

In principle, unit pricing is applicable to all formats of retail sale, not simply larger supermarkets, such as convenience stores, hot bread shops, service stations, newsagents, community charitable fundraising stalls, etc. However, the impact on the business through increased labour costs and the capacity to effectively implement unit pricing differs significantly depending on the business.

Smaller retailers currently operate on the basis of individually price ticketing items, and products may be displayed in a variety of ways other than with shelf pricing displays. Such small and specialty retailers would be required to acquire the support systems that will calculate the correct unit price and then provide additional ticketing equipment and additional specialised sticker to provide a unit price as well as a sale price on each item.

Large supermarkets generally operate on the basis of shelf pricing, utilising point of sale barcode scanning technology at check-outs. This provides the ability to apply unit pricing in an efficient and effective manner, and where consumers can readily identify and compare prices across a range of similar items on shelf display.

2.2 UNIT PRICING – A COSTLY EXERCISE

Food outlets, other than supermarkets, eg corner stores, kiosks and outlets where food is a secondary part of the business such as service stations and newsagents and even some of the smaller supermarkets price the product not the shelf. In these cases unit pricing could impose considerable costs in the installation of new shelving and display systems. It would also impose an unnecessary burden on charitable community event fund raising activities, where stalls and fetes are selling foods.

Considerations that must be taken into account that in imposing mandatory “shelf labelling” unit pricing, it will include the very significant capital and labour costs to establish and maintain such a system over and above the shelf pricing already in place. It will impose significant additional running costs to provide new labels each time a product is put on “special”. When “specials” are on sale the retailer provides the price and the “savings” information which is likely to be of greater value than unit pricing.

It is evident that the introduction of mandatory unit pricing would increase costs to the retail industry. However, the increase would not be distributed evenly throughout the industry, with the effect on smaller retailers expected to be greater than on the large supermarkets.

With relatively low profit margins in the retail food and grocery sector, the increased costs associated with unit pricing for shelf displays or individually ticketed items would be likely to be passed on to consumers in the form of higher prices. This would further erode the competitive position of smaller retailers, leading eventually to a decline in the number of small retailers and the possibility of creeping acquisition by larger retailers.

A secondary consequence of introducing unit pricing is a reduction in the range of products available at retail outlets in order to reduce the costs associated with managing the unit pricing requirements. This not only has significant impacts on the choice and availability of products for consumers, but significantly impacts on the manufacturing sector through reduce retail outlets and distribution. This is further exacerbated through the consumer-driven purchasing requirement that retailers stock a greater quantity of larger package sizes to ensure availability and take advantage of lower unit cost prices, further reducing the shelf space availability for smaller packages.

The AFGC considers that the primary application of unit pricing is in the supermarket sector, where it may be of assistance to consumers in making in-store purchasing decisions based on a comparison of prices, and particularly within brand. It is unlikely to influence consumer decisions as to which supermarkets to use, or whether information provided on products offered at a specialty delicatessen, bakery, service station, newsagent, pharmacy or kiosk is critical in the decision to purchase.

It would therefore be appropriate to limit the mandatory application of unit pricing to large retail supermarkets, or retail businesses with an annual turnover of more than \$5 million (as per the Australian Bureau of Statistics, definition of a small business).

It would also be appropriate to limit any consideration of mandatory requirements to shelf display systems, since the use of unit pricing is already applied to unpackaged displayed fruit and vegetables and delicatessen counter foods.

2.3 UNIT PRICING - A TRADE MEASUREMENT ISSUE

Unit pricing is currently regulated under the Trade Measurement Act under the auspices of the Ministerial Council on Consumer Affairs (MCCA) there is in place in the States and Territories uniform trade measurement legislation (UTML).

The Trade Measurement Acts in the States and Territories include special provisions for the sale of meat and requirements for the mass (i.e. weight) of meat to be marked in the same manner as the price marking including the price per kilogram to be indicated. The Trade Measurement (Pre-packed Articles) Regulations in the States and Territories provide for certain products to be unit priced when offered for sale in packs other than in particular specified pack sizes. These products are fruit, vegetables, mushrooms, cheese and cheese products, dressed poultry not marked in terms of minimum mass, fish including crustaceans, meat and smallgoods. While the States and Territories legislation is shortly to be superseded with the introduction of Commonwealth legislation, the National Measurement Amendment Bill 2008, this does not contain provisions for unit pricing. It is therefore unclear whether current unit pricing provisions will continue to be regulated.

Unit pricing has potentially the greatest utility where there are a variety of pack sizes provided at retail outlets. For example, pack sizes for cheese and cheese products may be: 100g, 125g, 200g, 250g, 375g, 500g, 750g, 1kg and integral multiples of 500g. In contrast, the pack sizes for herbs and spices are more likely to range from 1g to 25g, and are rarely, if ever, sold in quantities greater than 100g at retail outlets. Potatoes, on the other hand, may be sold in 2.5, 5 and 10 kilogram sacks.

If a standardised measure is to be proposed then it should be based on a unit appropriate to the size of the package; for example product packages that range in size between:

- 1 – 999 mg or mL should be labelled as per mg or per mL;
- 1 – 999 g or L, should be labelled as per gram or per Litre;
- 1 kilo gram or kilo litre, should be labelled as per kilo gram or kilo litre.

2.4 UNIT PRICING – ROLE AND IMPACT ON FOOD MANUFACTURERS

Food manufacturers package and label food but have no responsibility for setting retail prices and the display of food for retail sale. At best, manufacturers may be able to suggest a maximum retail price, but the actual price the product is sold at is determined by the retailer. Indeed it would be considered anti-competitive and would probably be in breach of trade practices legislation if the manufacturer were to set the retail price, or the unit price.

It is therefore not possible for manufacturers to include a unit price on labels. The pricing of their products varies from one retailer to another, as well as from one store to another operated by the same chain and is determined by the local retail manager.

Consumer purchasing decisions are based on a variety of factors such as, quality, and fitness for purpose. Foremost in the consumer demands of the food manufacturers by retailers and consumers is variety, innovation and the freedom to make a choose based on a variety of factors, such as quality of product, fitness for purpose, ethical or religious considerations, and environmental concerns. Price is only one factor taken into consideration, and is frequently confused with related issues concerning the country of origin, quality and safety of the product, as well as global supply and seasonal availability.

In food manufacturing, some products are likely to have difficulties in meeting tight weight tolerances for unit pricing, particularly where these are currently sold on a 'per piece' basis. For example, bread rolls or icing-coated donuts can be sold per piece, or more frequently per dozen. If unit pricing were applied on a standardised weight basis of per 100 grams, manufacturers will have trouble meeting a tight tolerance of cents per 100 grams due to the variability in the weights of the product.

There is currently no provision to permit the use of the average quantity system, although legislation is presently before the Federal parliament to do so. Should unit pricing be mandated then consideration should be given to permitting price per average unit, enabling the manufacturer to determine the average weight of the product rather than a minimum weight of a batch of product.

In considering the broader application of unit pricing to non-grocery items, consideration needs to be given to whether there is a consumer benefit for products such cosmetics, deodorant, lip stick, gladwrap, toilet paper, or vitamin pills. There are a variety of non-foods and groceries to which unit pricing could be applied in a variety of ways, whether it is per the single sales unit contained in a bulk purchasing pack, or per unit of measure contained in the sales unit.

For example, if it is to apply to products such as cling film wrap (such as gladwrap) or toilet paper on the basis of the unit of measure declared on the label, then the unit price may be based on metres, or km, as appropriate. Clearly it would be more realistic to represent toilet paper as per metre, than per kilometre, when there is generally no more than 50 metres of paper on a toilet roll, while cling film wrap may be 5, 10, 25, 50, or 100 metres.

However, not all rolls of toilet paper are directly comparable. Some toilet paper will be two layer paper an others will be three or more layers, some made from recycled paper or recycled fibre, others made from virgin paper. Similarly, not all cling film wraps are directly comparable, with some brands not having the same width as other brands, or variations in the films thickness, clinginess, and suitability for microwaving or freezing. A more appropriate unit of measure may therefore be per square metre, or perhaps per cubic metre.

A reduction in retail distribution, increased costs, reduced competition and limitations imposed on manufacturers by the units that must be measured and their tolerances has the potential to stifle innovation and further reduce competitiveness and viability of the manufacturing sector.

It is therefore essential that the introduction of mandatory shelf display unit pricing requirements be limited to certain categories of products where the consumer is likely to gain most benefit, such as standardised packaged foods.

2.5 IN MOST OTHER SITUATIONS UNIT PRICING IS NOT RELEVANT

Unit pricing will have a limited use in decision making to purchasing large or small containers of perishable products or products that are perishable once opened, but rather that the purchasing decision is based on other needs.

For example, the purchaser knows that he/she is buying sufficient quantity for a specific number of people or a specific period of time, and within the shelf life of the product. Milk typically has a 10 to 14 day shelf life, and therefore a single person who uses milk only in tea or coffee is ill advised to buy a two litre container of milk, even if it is five cents per litre cheaper than milk in a 600 mL container, because they are likely to discard more than half of the milk.

It should also be noted that in products such as milk, the major benefit in unit pricing is to be able to compare the per unit cost within brand. The consumer is easily able to compare the price of different brands of milk, since the packaging is standardised, and the two litre bottles of milk are easily compared side-by-side. Similarly, products such as eggs come in standardised packaging of one dozen, but within a brand may vary as 500, 600 or 700 grams.

As noted above, the purchasing decision for such products extends beyond simply considering the price. Milk may be full cream, low fat, modified, etc. Eggs may be from caged hens, barn laid, free range, grain fed or omega-3 enriched. Therefore, the comparability across different brands with differing benefits and characteristics is not as easy as comparability within a brand. Since the major difference within a category of a brand of a dozen eggs is the size of the egg, yet it would be inappropriate to require unit pricing of cents per gram of an egg, and misleading to require cents per egg when they are not the same size.

2.6 UNIT PRICING – ENCOURAGING INAPPROPRIATE CONSUMER BEHAVIOUR

There are also concerns that unit pricing encourages inappropriate consumer behaviour, encouraging consumers to purchase larger package sizes on the basis of making a small saving for a bulk purchase. This raises two significant concerns about the potential chances to consumer behaviour:

- **Likely to undermine government and industry efforts in addressing the obesity epidemic and over-consumption.**

In order to take advantage of greater savings with bulk package product, consumers then have larger quantities that they are likely to consume. As an illustration, consider the movie “Supersize me”, and the implications of changing consumer behaviour to always up-size due to perceived value.

Introducing a mandatory unit pricing system undermines industry initiative to introduce portion control, making it easier for consumers to purchase smaller quantities of product, and thereby manage their dietary consumption. If unit pricing drives consumers to purchase larger packages based on a cheaper price there is no incentive for industry innovation in smaller portion control sizes.

- **Like to result in false economy and greater cost for no net benefit to the consumer.**

It will prove to be a false economy if the basis of making a saving is to purchase a larger volume of product for a cheaper unit price. If the consumer is unable to use all the product once the package is opened, or within the shelf life of the product, whatever small savings may have been gained in the purchase price are lost when the greater volume of product is discarded.

- **Undermines the government initiatives to minimise wastage and reduce greenhouse gases.**

Increased wastage has implications for increased costs to municipal governments in managing greater volumes going to landfill, along with the potential increased in production of methane greenhouse gases from the breakdown of food scraps in landfill. Purchasing larger quantities of product and demands for greater retail sales of larger volume products leads to increases the road freight and consumer transport costs, leading to further increases in greenhouse gases.

2.7 ENFORCEMENT DIFFICULTIES

One of the key concerns with mandatory regulated requirements is that the government agency responsible has the ability to provide an enforcement capability and ensure that there is a level playing field.

One of the problems with introducing a shelf display unit pricing system which is applied only to the large retail supermarkets will be the collection of evidence, since the products on display are not individually ticketed, and the supermarket has the capacity to rapidly change the point of sale and shelf display tickets.

3 CONCLUSION

The AFGC considers that the primary application of unit pricing is in the supermarket sector, where it may be of assistance to consumers in making in-store purchasing decisions based on a comparison of prices within brand. It is unlikely to influence consumer decisions as to which supermarkets to use, and given that purchasing decisions involve a variety of factors in addition to price, it is unlikely to be of particular relevance when comparing different brands of differing quality and utility within a similar class of product.

The AFGC has significant concerns regarding any proposal to mandate unit pricing on the basis that it would:

- be contrary to the principle of minimum effective regulation;
- is already provided at retail level where it is most important, on unpackaged produce;
- impacts on a wide range of consumer goods, not just foods;
- undermines efforts to reduce the obesity epidemic by encouraging over-consumption;
- false economy for consumers where they are unable to utilise perishable product purchased in larger volumes to take advantage of lower unit prices;
- results in increased wastage and undermines efforts to minimise environmental impacts;
- costs of mandatory legislation and enforcement would outweigh the benefits.

The AFGC would support the introduction of a voluntary Code of Conduct or ACCC guidelines for industry on the basis that this provides a fair and equitable balance, ensuring a level playing field for those businesses that wish to apply unit pricing and the flexibility for certain products and small businesses to be opt into using such a system where it makes commercial sense and there is consumer demand.

Should it be considered that a mandatory unit pricing scheme is required, the AFGC recommends that such a system be limited in scope, with small business being exempt, and that such requirements only apply where there is a shelf display system supported by bar code scanning checkout.

The AFGC is also concerned that the introduction of any unit pricing system, mandatory or voluntary, needs to be supported by a well considered consumer education campaign which not only addresses the question of how to interpret unit pricing, but also addressing concerns that may result in inappropriate consumer behaviour.

APPENDIX A: AFGC MEMBERS AS AT 24 SEPTEMBER 2008

AAB Holdings Pty Ltd
 Arnott's Biscuits Limited
 Snack Foods Limited
 The Kettle Chip Company Pty Ltd
 Asia-Pacific Blending Corporation Pty Ltd
 Barilla Australia Pty Ltd
 Beak & Johnston Pty Ltd
 BOC Gases Australia Limited
 Bronte Industries Pty Ltd
 Bulla Dairy Foods
 Bundaberg Brewed Drinks Pty Ltd
 Bundaberg Sugar Limited
 Cadbury Schweppes Asia Pacific
 Campbell's Soup Australia
 Cantarella Bros Pty Ltd
 Cerebos (Australia) Limited
 Christie Tea Pty Ltd
 Clorox Australia Pty Ltd
 Coca-Cola Amatil (Aust) Limited
 SPC Ardmona Operations Limited
 Coca-Cola South Pacific Pty Ltd
 Colgate-Palmolive Pty Ltd
 Coopers Brewery Limited
 Dairy Farmers Group
 Danisco Australia Pty Ltd
 Devro Pty Ltd
 Dole Australia
 DSM Food Specialties Australia Pty Ltd
 DSM Nutritional Products
 Earlee Products
 Ferrero Australia
 Fibrisol Services Australia Pty Ltd
 Fonterra Brands (Australia) Pty Ltd
 Foster's Group Limited
 Frucor Beverages (Australia)
 General Mills Australia Pty Ltd
 George Weston Foods Limited
 AB Food and Beverages Australia
 AB Mauri
 Cereform/Serrol
 Don
 GWF Baking Division
 George Weston Technologies
 Jasol
 Weston Cereal Industries
 GlaxoSmithKline Consumer Healthcare
 Golden Circle Limited
 Goodman Fielder Limited
 Meadow Lea Australia
 Quality Bakers Aust Pty Ltd
 H J Heinz Company Australia Limited
 Hans Continental Smallgoods Pty Ltd
 Harvest FreshCuts Pty Ltd
 Heimann Foodmaker Group
 Hoyt Food Manufacturing Industries Pty Ltd
 Johnson & Johnson Pacific Pty Ltd
 Pfizer Consumer Health

Kellogg (Australia) Pty Ltd
 Day Dawn Pty Ltd
 Kikkoman
 Kimberly-Clark Australia Pty Ltd
 Kerry Ingredients Australia Pty Ltd
 Kraft Foods Asia Pacific
 Lion Nathan Limited
 Madura Tea Estates
 Manildra Harwood Sugars
 Mars Australia
 Mars Food
 Mars Petcare
 Mars Snackfood
 McCain Foods (Aust) Pty Ltd
 McCormick Foods Aust. Pty Ltd
 Merino Pty Ltd
 Merisant Manufacturing Aust. Pty Ltd
 National Foods Limited
 Nerada Tea Pty Ltd
 Nestlé Australia Limited
 Nestlé Foods & Beverages
 Nestlé Confectionery
 Nestlé Ice Cream
 Nestlé Nutrition
 Foodservice & Industrial Division
 Novartis Consumer Health
 Australasia
 Nutricia Australia Pty Ltd
 Ocean Spray International, Inc
 Parmalat Australia Limited
 Patties Foods Pty Ltd
 Peanut Company of Aust. Limited
 Procter & Gamble Australia Pty Ltd
 Gillette Australia
 PZ Cussons Australia Pty Ltd
 Queen Fine Foods Pty Ltd
 Reckitt Benckiser (Aust) Pty Ltd
 Ridley Corporation Limited
 Cheetham Salt Limited
 Sanitarium Health Food Company
 Sara Lee Australia
 Sara Lee Foodservice
 Sara Lee Food and Beverage
 SCA Hygiene Australasia
 Sensient Technologies
 Simplot Australia Pty Ltd
 Specialty Cereals Pty Ltd
 Spicemasters of Australia Pty Ltd
 Stuart Alexander & Co Pty Ltd
 Sugar Australia Pty Ltd
 SunRice
 Swift Australia Pty Ltd
 Symrise Pty Ltd
 Tate & Lyle ANZ
 The Smith's Snackfood Co.
 The Wrigley Company
 Unilever Australasia

Waters Trading Pty Ltd
 Wyeth Australia Pty Ltd
 Yakult Australia Pty Ltd

Associate members

Accenture
 Australia Pork Limited
 ACI Operations Pty Ltd
 Amcor Fibre Packaging
 CHEP Asia-Pacific
 Concurrent Activities
 Dairy Australia
 Exel (Aust) Logistics Pty Ltd
 Focus Information Logistics Pty Ltd
 Food Liaison Pty Ltd
 FoodLegal
 Food Science Australia
 Foodbank Australia Limited
 IBM Business Cons Svcs
 innovations & solutions
 KPMG
 Lawson Software
 Legal Finesse
 Linfox Australia Pty Ltd
 Meat and Livestock Australia Limited
 Monsanto Australia Limited
 PricewaterhouseCoopers
 Promax Applications Group Pty Ltd
 Sue Akeroyd & Associates
 Swire Cold Storage
 Swisslog Australia Pty Ltd
 The Nielsen Company
 Touchstone Cons. Australia Pty Ltd
 Visy Pak
 Wiley & Co Pty Ltd

PSF members

Amcor Fibre Packaging
 Bundaberg Brewed Drinks Pty Ltd
 Cadbury Schweppes Asia Pacific
 Coca-Cola Amatil (Aust) Limited
 Foster's Group Limited
 Golden Circle Limited
 Lion Nathan Limited
 Owens Illinois
 Visy Pak

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