18 August 2026

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Dear FSANZ

Attached are the comments that the Australian Food and Grocery Council wishes to submit on the *Call for information: Common commencement date for labelling changes*.

If you have any queries, please contact Anne-Marie Mackintosh anne-marie.mackintosh@afgc.org.au

Yours faithfully

Dr Duncan Craig
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FSANZ Call for information: Common commencement date for labelling changes

18 AUGUST 2026

AUSTRALIAN
FOOD &
GROCERY
COUNCIL

PREFACE

The Australian Food and Grocery Council (AFGC) is the leading national organisation bringing Australia's fast-moving consumer goods (FMCG) sector together to champion growth.

With an annual turnover in the 2024-25 financial year of $182.6 billion, Australia's food and grocery manufacturing sector makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity. Each business in the sector has contributed towards an industry-wide $4.5 billion capital investment in 2024-25, underpinning the sector's continued growth.

Food and grocery manufacturing together forms Australia's largest manufacturing sector, representing over 33 per cent of the total national manufacturing workforce. The industry makes a large contribution to Australia's rural and regional economies, with over 30 per cent of its 301,000 employees based outside metropolitan areas.

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

The industry's growth ambition to 2030 is set out in *Sustaining Australia: Food and Grocery Manufacturing 2030,* which outlines a path to expand domestic manufacturing, create jobs, increase exports and strengthen the sovereign capability of the entire sector.

This submission has been prepared by the AFGC and reflects the collective views of the membership.

GENERAL COMMENTS

The Australian Food and Grocery Council (AFGC) and its members appreciate the opportunity to respond to the Food Standards Australia New Zealand (FSANZ) ***Call for information: Common commencement date for labelling changes***.

AFGC supports, in principle, FSANZ introducing an annual common commencement date for food labelling changes. AFGC considers this would improve regulatory certainty, help businesses plan packaging and production changes more efficiently, and potentially reduce compliance costs and minimise packaging waste.

AFGC generally supports 30 May as a practical annual commencement date, noting that it avoids key holiday and production pressure periods. However, the submission stresses that adequate transition periods must continue to apply, stock-in-trade provisions should be retained, and FSANZ should maintain flexibility to respond quickly where public health or safety issues arise.

QUESTIONS

1. **Do you agree in principle with establishing an annual common commencement date for FSANZ-initiated label changes?**

AFGC supports the proposal in principle

AFGC supports, in principle, the introduction of an annual common commencement date for FSANZ-initiated food labelling changes.

AFGC members have consistently identified the implementation of regulatory change as a significant compliance activity requiring substantial planning, coordination and investment. The ability to align multiple labelling changes to a single annual commencement date would improve regulatory certainty and enable businesses to plan packaging updates, artwork revisions, packaging procurement and production scheduling more efficiently.

Benefits of a common commencement date

A common commencement date is likely to deliver several benefits:

- Improve regulatory certainty and planning for food businesses.
- Enable better planning for compliance and implementation costs of multiple changes to be incorporated into a single label update cycle.
- Reduce potential packaging waste through better alignment with existing packaging inventory and production runs.
- Improve efficiency for manufacturers supplying both domestic and export markets, particularly where packaging changes need to be coordinated across multiple jurisdictions.

- Improve consistency for enforcement agencies and other stakeholders by providing a predictable implementation cycle.

Flexibility should be maintained

AFGC also supports FSANZ retaining flexibility to make changes outside the annual common commencement date on a case-by-case basis where justified by public health and safety considerations.

Transition periods should not be shortened

The following examples illustrate how the proposed approach would operate where the common commencement date falls after the existing transition end date.

Appropriate transition periods remain critical. A common commencement date should not shorten the transition period that would otherwise be appropriate for complex labelling changes. As shown in the examples in the table below, the proposed framework appears to extend, rather than shorten, the practical transition period for P1030 and P1044 by aligning the final compliance date with the next 30 May common commencement date. This approach is supported, provided industry can begin transitioning from the date of gazettal and is not required to wait until the common commencement date to start implementation. The common commencement date should therefore operate as the final compliance date, while gazettal should remain the point from which businesses can start updating labels, packaging and production systems.

Label change	Gazette date	Transition period (yrs)	Transition in current framework	Transition in proposed framework - new date
P1030	14 /8/2022	2	14/8/2022-2023 = 1st yr 14/8/2023-2024 = 2nd yr Ends on 14/8/24	**30/5/2025** additional 9 months given
P1044	26/2/2021	3	26/2/2021-2022 = 1st yr 26/2/2022-2023 =2nd yr 26/2/2023-2024 = 3rd y Ends on 26/2/24	**30/5/2024** Additional 3 months given

Stock-in-trade provisions should continue

Stock-in-trade provisions should continue to be available to minimise unnecessary food and packaging waste and reduce the need to destroy or rework compliant products already in the supply chain.

Cumulative compliance burden should be monitored

FSANZ should monitor the cumulative compliance burden that may arise if multiple significant labelling reforms have final compliance dates in the same year, or on the same common commencement date.

Industry generally plans packaging and label updates around final compliance dates, rather than commencement dates, so it is important that FSANZ considers the overall number and scale of labelling changes that industry may need to implement at the same time.

Timely decision-making is important

This is particularly important for major reforms that affect a large proportion of products. For example, the proposed addition of added sugars to the Nutrition Information Panel had the potential to affect approximately 99 per cent of SKUs in the market.

Where proposals remain unresolved for extended periods, industry must decide whether to delay planned packaging updates or proceed with changes, knowing that further regulatory decisions may require another round of packaging revisions. To reduce this uncertainty and avoid unnecessary compliance costs, FSANZ should make timely decisions on significant labelling reform proposals and avoid leaving proposals open-ended for many years before they are formally withdrawn.

Overall AFGC position

Overall, AFGC considers the proposed approach has the potential to improve regulatory efficiency, provided it preserves sufficient flexibility to manage public health and safety priorities as appropriate and gives industry adequate time to implement complex labelling changes.

2. Do you agree with 30 May as an appropriate annual common commencement date? If not, what are the disadvantages of this date? What are preferable alternative dates and why?

AFGC supports 30 May

AFGC generally supports 30 May as the proposed annual common commencement date.

Members consider that late May is a practical time of year for implementation and avoids several periods that may present greater operational challenges for food manufacturers, including the end-of-calendar-year holiday period and peak seasonal production periods **for some sectors.**

A commencement date of 30 May would provide:

- Sufficient separation from the December-January holiday period when many businesses operate with reduced staffing and production schedules. Manufacturing shutdowns can extend into early–mid February (including Lunar New Year impacts).
- An implementation window that allows businesses to incorporate changes into annual packaging review and procurement cycles.
- A predictable timeframe that can be considered during product planning, inventory management and budget forecasting.
- Improved coordination across industry, regulators and enforcement agencies.

AFGC notes the consultation paper indicates that 30 May was identified during preliminary discussions as a period likely to be less disruptive to food production cycles.

While AFGC supports 30 May, the date itself is less important than ensuring that:

- the commencement date remains fixed and predictable from year to year;

- adequate transition periods continue to be provided;
- implementation requirements are clearly communicated well in advance; and
- exceptional circumstances can still be accommodated where necessary.

If FSANZ determines an alternative date would better achieve these objectives, AFGC would be open to considering other options. However, on the information currently available, AFGC considers 30 May to be an appropriate and practical annual commencement date.

Implementation guidance and review

Review the effectiveness of the framework

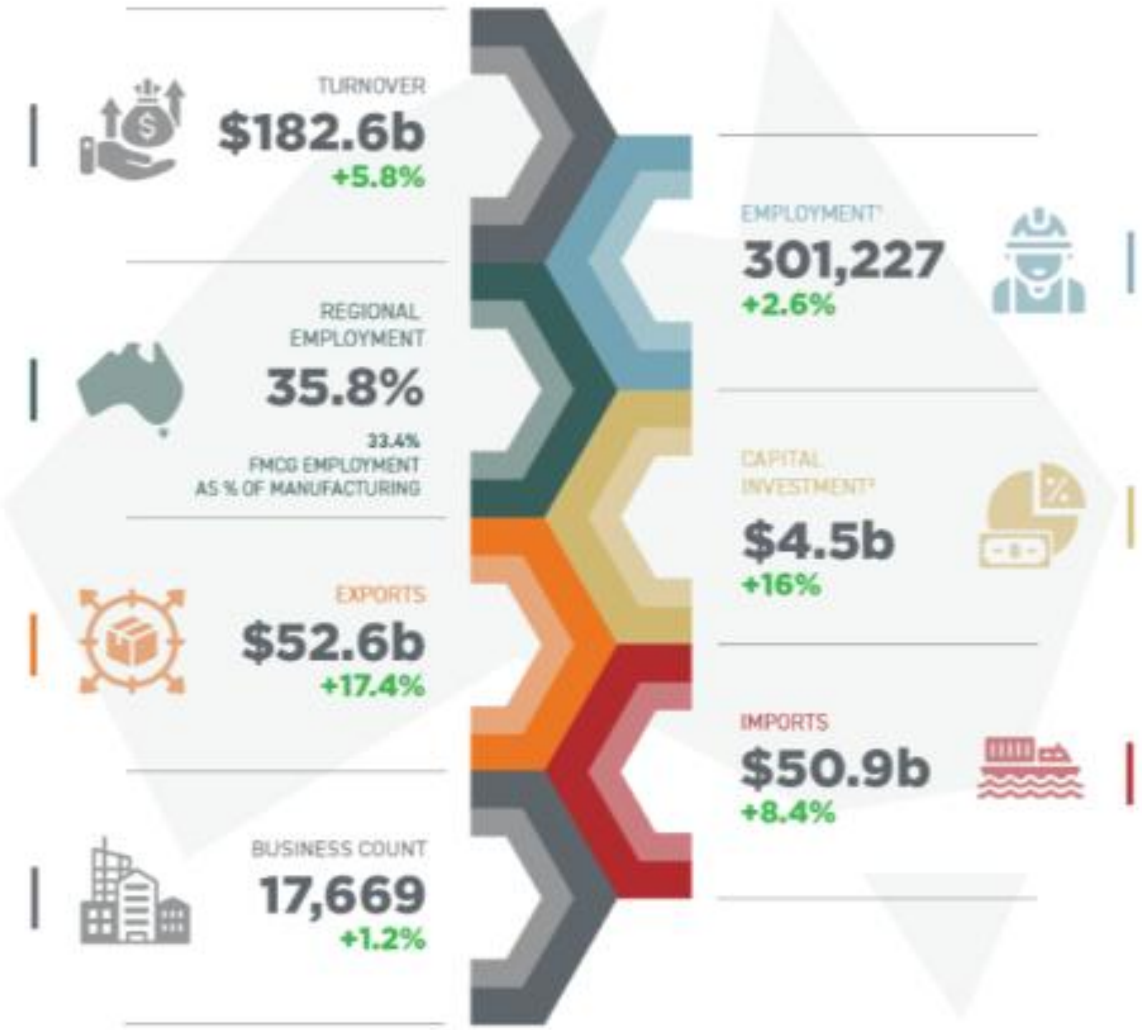
AFGC encourages FSANZ to periodically review the effectiveness of the common commencement date approach after implementation. Such a review should assess whether the arrangement is achieving its objectives of reducing compliance burden, improving regulatory certainty and facilitating efficient implementation of labelling changes across the food supply chain.

Publish clear implementation guidance

AFGC also recommends that implementation guidance be developed early to explain how common commencement dates, transition periods and stock-in-trade provisions will interact in practice. This guidance should be made publicly available on the FSANZ website to support transparency and provide industry with a consistent understanding of commencement dates, transition periods and applicable requirements.

State of the Industry
2024-25

AUSTRALIAN FOOD & GROCERY COUNCIL



The figures on this page exclude the fresh food sector and are based on 2024-25 ABS data.

1: This is total number of employees, head count basis and does not include seasonal employees.
2: Gross fixed capital formation for food, beverage and tobacco manufacturing subsector is taken as indicator of capital investment.