

Expansion of Premium Cocoa Export to Australia

May 2024

A close-up, top-down view of several chocolate-covered treats, likely ice cream sandwiches or chocolate-covered cookies, arranged on a white surface. The chocolate coating is dark and glossy, with small, light-colored nuts embedded in it. The lighting creates highlights and shadows, emphasizing the texture of the chocolate and the nuts.

# How Sweet It Is

Indonesian Chocolate in Australia

This report has been prepared by:



in partnership with:



# Preface



In the past when a relative or colleague went on a business trip overseas, the safest premium gift to bring home used to be a Belgian seashells chocolate box. I am happy to report that this has changed since Indonesia has more and more premium chocolate brands with various cocoa origins from Sumatera to Papua. It is so common nowadays to receive Bali-origin chocolate bars instead from someone travelling back from a trip within Indonesia. If our holiday makers are giving chocolate gifts from Indonesia, then why not explore exporting our Indonesian chocolate too?

Every year, Australia imports about AUD 700 million worth of chocolates from overseas. In comparison, coffee beans imports are approximately AUD 1 billion. Needless to say, Australia is a such big chocolate market. However, when I found out that most imported chocolate still comes from Europe, the USA, and even other neighboring SEA countries (Singapore, Malaysia, Thailand, Vietnam) made it into Australia's top 20 import sources. In contrast, Indonesia has never been in the top 20. I can't be more honoured and humbled to be part of a pilot project that will hopefully change that in the near future.

Within the framework of the Indonesia-Australia Comprehensive Economic Partnership Agreement, our mandate is to support closer trade and investment between Indonesia and Australia, including in agrifood and agriculture. Given the gigantic production volume of cocoa in Indonesia, with a broad range of quality single origin beans, and Australia's ever-growing demand for gourmet chocolate, Katalis is investigating the feasibility of Indonesian chocolate businesses to enter Australia in the most strategic, lucrative way.

*"How Sweet It Is - Indonesian Chocolate in Australia: Expansion of Premium Cocoa Export to Australia"* is a short investigation into the opportunities for Indonesian and Australian companies to partner in this space and we hope that you will find the contents of this report easy-to-digest, motivating and effective for your business expansion and be the next *Willy Wonka*.

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# I Terms

Common terms used throughout this report are defined below.

**Chocolate manufacturers:**

Entities that buy large quantities of bulk and premium cocoa beans. This group includes the major multinationals.

**Cocoa bean producers:**

Entities that sell dried beans, either fermented and unfermented, dried for bulk and speciality premium market segments.

**Bean-to-bar producers:**

Entities that control all chocolate making steps from buying the cocoa beans to making the chocolate bars.

Australia has over 37 bean-to-bar producers, with the largest, Haigh's Chocolates, accounting for more than 80% of all beans imported into Australia.

**Artisan or craft chocolate makers:**

Smaller bean-to-bar producers. The term 'craft chocolate maker' emerged a decade ago in response to the large chocolate manufacturers adopting/co-opting the 'bean-to-bar' identity. In Australia, craft chocolate makers typically import less than 75 tonnes of 'speciality' cocoa beans each year. Australian craft chocolate makers seek out high quality beans (low to zero defects), that are centrally fermented and solar dried, with a good sensory profile and a good story.

**Tree-to-bar producers:**

Entities that control the chocolate making process from cultivating cocoa trees to making chocolate. Australia has a handful of tree to-bar producers (e.g. Charley's and Daintree Estate in North Queensland).

# I Acronyms

A&P	Advertising and Promotions
DAFF	Australian Government Department of Agriculture, Fisheries and Forestry
DTC	Direct-to-Consumers
FSANZ	Food Standards Australia New Zealand
IA CEPA- ECP	Indonesia – Australia Comprehensive Economic Partnership Agreement Economic Cooperation Program
SRP	Shelf-ready packaging



## Introduction

The report aims to identify potential strategies for Indonesian premium chocolate and premium cocoa producers to access Australian markets. Indonesia's premium cocoa industry has grown over the past five years, and so has consumption of premium chocolate in Australia. As such, Australia offers a launching pad for accelerating the growth of the Indonesian premium cocoa industry, with the potential to increase exports to Australia and third markets.

### Overview of Katalis

The Indonesia-Australia Comprehensive Economic Partnership Agreement (IA-CEPA) Economic Cooperation Program Katalis (Katalis) is a five-year (2020-25) economic development program unlocking the vast economic potential of the partnership between Australia and Indonesia. Established under the IA-CEPA, Katalis complements existing Australian development program activities with a commercially oriented, bilateral approach.

Katalis seeks to develop new market opportunities and inspire new business partnerships to drive trade and investment between Australia and Indonesia. Katalis seeks opportunities to bring together the complementary strengths and ambitions of Australia and Indonesia to realise economic potential by sharing market insights, building skills and knowledge, providing technical advice, and supporting policy reform.

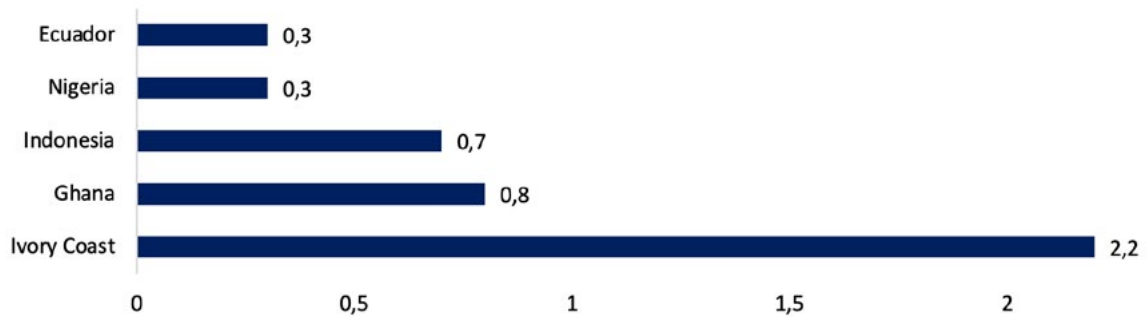
### Current Indonesian chocolate production

Indonesia's cocoa market has undergone major structural change over the past 15 years. Firstly, cocoa bean production has dropped dramatically over the past decade due to pests, diseases, low yields, old plants, and policy impacts, including an export tax on cocoa exports. Indonesia has dropped from one of the top three leading cocoa bean producing countries to 13. Comparing average annual production for the three-year period 2013-2015 with 2019-2022, shows a 50% decrease from 340,000 metric tons to 176,000 metric tons.

Second, Indonesia is now the third-largest cocoa bean grinding country in the world, with 500,000 metric tonnes of capacity, just behind Cote d'Ivoire and the Netherlands. At the same time as Indonesia introduced a tax on cocoa beans exports, it dropped its import tariff. This led to four major international cocoa manufactures opening operations in Indonesia, increasing the country's grinding capacity from around 125,000 metric tonnes to nearly 500,000 metric tonnes. As a result, Indonesia is now also one of the world's largest cocoa bean importers.

In 2020, five countries produced 77% of the world's cocoa beans, with Indonesia ranked third (see Figure 1). The four manufacturers, Olam, Barry Callebaut, Cargill and the Malaysian company Guang Chong manufacturers, collectively control more than 90% of Indonesia's grinding capacity.

**Figure 1. Global cocoa bean producers, top five**



Source: BBC (2020). <https://www.bbc.com/indonesia/dunia-62059844>. Replicated from Food and Agriculture Organization.

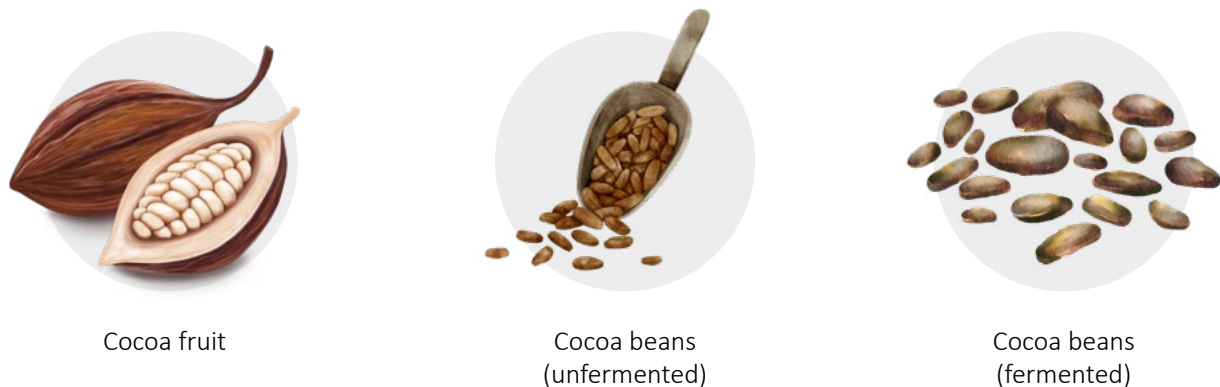
Indonesia is a major exporter of cocoa butter, with 90% of the total export value of cocoa and chocolate products generated by cocoa butter in 2021. This trend has emerged over the last 15 or so years and has involved a drastic shift from cocoa bean dominated export value to cocoa butter dominated sales. The core characteristic of cocoa butter value chains is that they are dominated by low-value exports with little scope for quality differentiation.

## Current Indonesian chocolate production

The Australian market, in contrast to Indonesia, is a mature market for premium bean-to-bar products. It is also small and highly competitive. There are 37 current premium bean-to-bar producers in Australia. These producers typically import beans from countries other than Indonesia, though one of the interviewees for this study (Bahen and Co) indicated that they have been actively seeking out premium Indonesian cocoa beans in recent years. (A complete list of Australian Bean to Bar providers is at Annex 3).

There are signs, however, that Indonesian cocoa bean producers have the potential to access higher value markets. For example, Indonesian cocoa bean exports to Japan, and even Australia, appear to be at relatively high unit values, almost equal to the highest average value of any cocoa bean imports from any country into Japan.

**Figure 2. Various cocoa products in different stages**



Direct exports of chocolate bars from Indonesia to Australia are very low in both quantity and value. This reflects substantially lower volumes of chocolate bars in Indonesia compared to other cocoa products.

Australia also imports cocoa beans from Indonesia, but at very low quantities, and with generally only average-to-low value. Over the five years to 2022, imports of cocoa beans from Indonesia averaged only 1% of total cocoa bean imports. Import values for cocoa beans from Indonesia were similar to average values from other source countries (excluding an outlier year in

2021). However, the unit value for cocoa bean exports from Indonesia to Australia is lower than the average export unit value for Indonesian beans (excluding 2021), indicating most cocoa beans exported to Australia are not higher quality beans.

Australian imports of bars (filled and unfilled) primarily come from Western Europe, New Zealand, China and the United States. This does not include domestic production of bars from cocoa butter and liquor. Indonesia represents a very small proportion of imports for chocolate bars, on average about three tonnes annually.



## Australian chocolate consumer behaviour

Approximately one third of Australian chocolate consumers prefer a regular milk chocolate tablet. Only 13% of Australians responding to a survey reported by IBISWorld said that dark chocolate was their favourite. Almost one third of Australian chocolate consumers are brand loyal. However, the bulk of consumers in Australia are price sensitive, and buy chocolate based on promotional prices. This implies there is a limited

market for premium chocolate products in Australia, despite overall high per capita chocolate consumption.

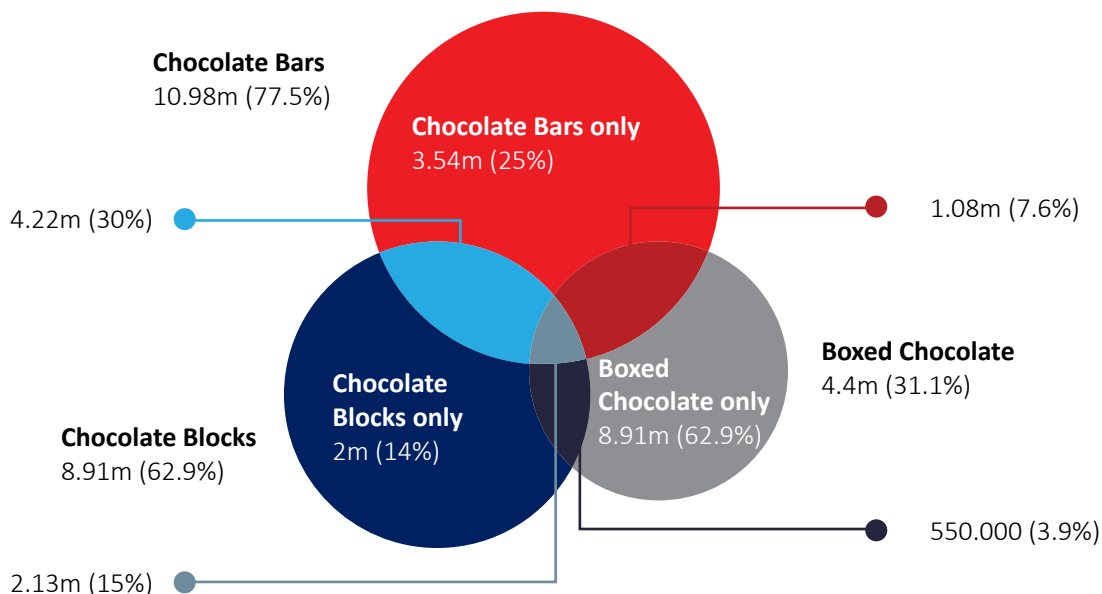
Health-conscious Australian consumers are increasingly drawn to dark, dark milk and sugar-free chocolates, as well as filled chocolates, and there is a growing trend toward sustainable sourcing and traceability (see Table 1).

**Table 1. Current and emerging consumer preferences for premium chocolate products**

Consumer preference category	Premium chocolate market consumers
Health consciousness and clean labels	Australian consumers are increasingly drawn to dark, dark milk and sugar-free chocolates. This is driven by the growing appreciation of health benefits of cocoa and its polyphenol content, which contributes towards healthy ageing.
Ethical sourcing and sustainability	Consistent with global trends, the Australian market is increasingly leaning towards ethically sourced cocoa, especially among craft and multinational brands. The growing emphasis on sustainability resonates strongly in Australia, reflecting a global movement that aligns with Australian values.
Transparency	Australian consumers have a strong preference for knowing the origin of all ingredients used in chocolates. Whether motivated by allergies, vegan preferences, or a desire for quality, this focus on transparency is a defining feature.
Filled chocolates, inclusions, and festive occasions	Filled chocolates hold a large market share, with inclusions in dark and dark milk best sellers. Filled chocolates are associated with indulgence and the opportunity for creative flavour combinations make them particularly popular for festive occasions.
E-commerce and online sales	The online segment is growing rapidly, offering convenience, wide selection, and discounts. This trend was particularly accentuated during the COVID-19 pandemic, reflecting a broader shift in retail behaviour.
Local artisans and premiumisation	Australian bean-to-bar business have tripled in the past eight years. Many local brands are thriving, and Coles, Woolworths and Aldi chains are expanding their own premium lines.
Quality and innovation	The emphasis on quality and innovation is driving demand for premium, single-origin, and bean-to-bar chocolates. Consumers are increasingly seeking unique flavours, textures, and experiences with high-quality cocoa, including innovative flavours, inclusions, First Nations ingredients and luxury packaging.

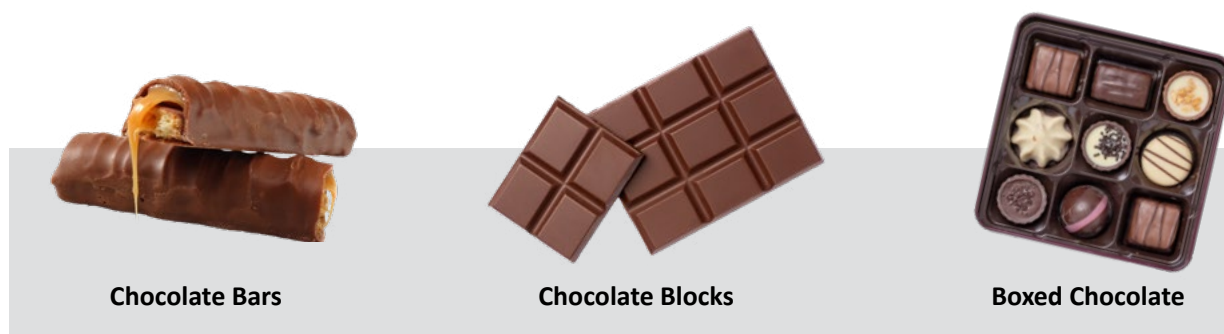
The 14.2 million Australians aged over 14 years of age consume an average of four chocolate bars per week. Chocolate bars are the preferred choice over chocolate blocks, with 77.5% of Australians who consume chocolates choosing chocolate bars (around 11 million people), 62.9% consuming chocolate blocks (around 8.9 million people), and 31.1% consuming boxed chocolate (around 4.4 million people) (Figure 3).

**Figure 3. Chocolate product consumption in Australia**



Source: Roy Morgan Single Source (Australia), April 2018-March 2019 (n=14,722). Base: Australian chocolate eaters 14+.

**Figure 4. Examples of chocolate product types in Australia**



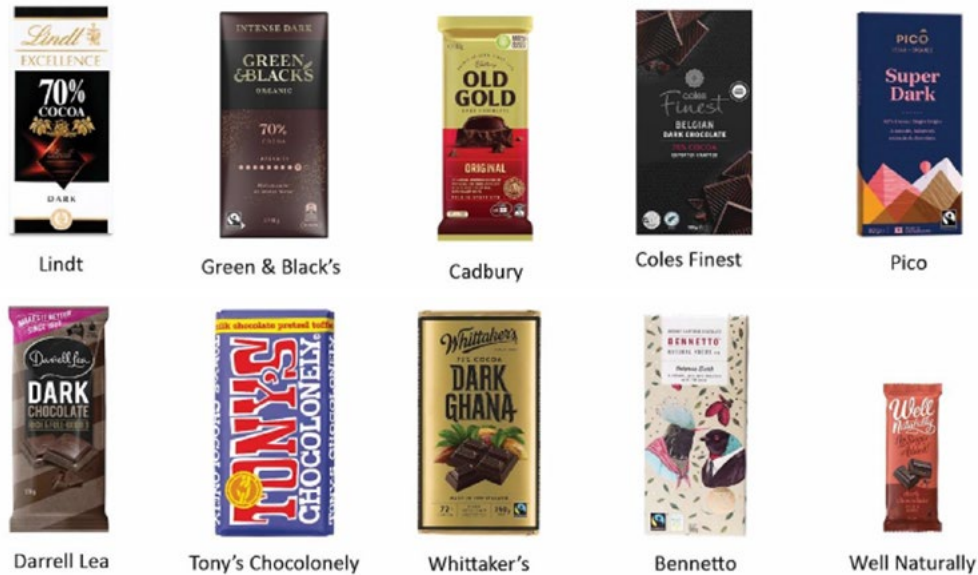
Of the 8.9 million Australians who consume chocolate blocks, 36% prefer milk chocolate, while 5% prefer white chocolate and 13% prefer dark chocolate (Canstar Blue, 2023). Block chocolate is the go-to snack for 30% of Australians, represents 29% of chocolate gift purchases, is purchased by 34% of consumers during their regular grocery shop. Of those who purchase block chocolate during their regular grocery shop, 27% are brand-loyal, while 54% are price-sensitive and buy chocolate based on promotional prices.

## Australian chocolate distribution and retailing channels

### National supermarkets

The Australian supermarket industry is dominated by three major supermarket chains: Woolworths and Coles, followed by the German chain Aldi. All have import capabilities, state distribution centres and hundreds of stores across Australia. In 2022, Woolworths was the largest supermarket chain in Australia, with a market share of 37%.

Figure 5. Selected chocolate brands sold in national supermarkets

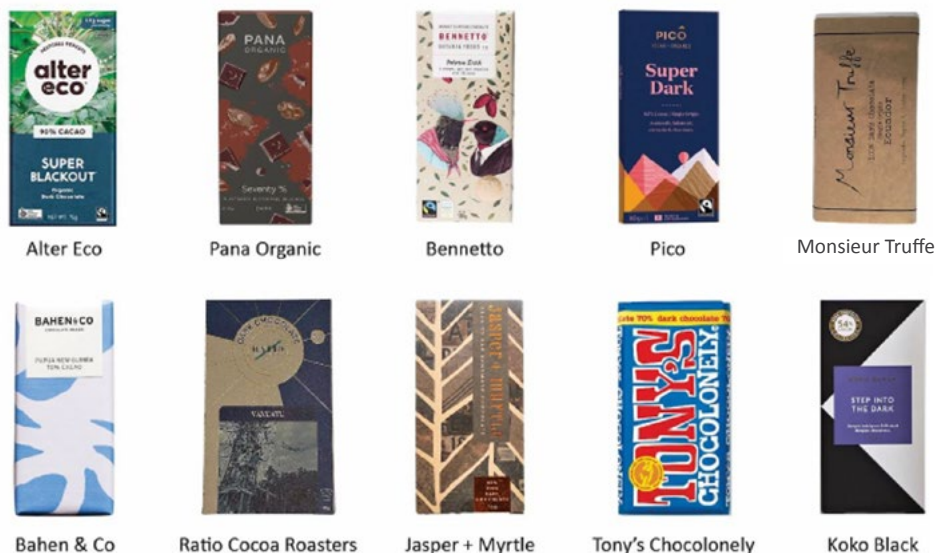


### Independent chains

The Australian supermarket industry is dominated by three major supermarket chains: Woolworths and Coles, followed by the German chain Aldi. All have import capabilities, state distribution centres and hundreds of stores across Australia. In 2022, Woolworths was the largest supermarket chain in Australia, with a market share of 37%.

### Fine food and specialty stores

Even though product costs in specialty stores may be higher than for supermarkets, they can usually source products with more stringent standards and have more opportunities for personal interactions, allowing them to educate customers, point out product features, and heavily promote a brand.



## E-commerce

Online sales have dramatically increased since COVID-19 in 2020 and continue to grow in Australia. Without a traditional retail location, e-commerce businesses can reduce their operational costs (e.g. less overhead costs, no rent for a storefront) and, therefore, can sell products at a lower margin and a more competitive price. A brand selling online can reach virtually anyone, and customers can order at any time of the day or night.

Australia has one dominant specialist e-commerce distributor for premium bean-to-bar chocolates, Bean.Bar.You (<https://beanbaryou.com.au/>). There are also a plethora of single-brand e-commerce bean to-bar sites, many of which are additional sales channels for existing 'brick-and-mortar' outlets (physical retail storefronts).

## Convenience stores

Convenience stores have limited shelf space and typically focus on providing products that are deemed convenient and essential. Requiring high turnover, convenience stores will generally carry mass-produced chocolates from major brands to drive up sales volumes.



## Branded stores

Many specialty chocolate brands have their own branded stores as a physical representation of their brand, which can significantly increase brand visibility and recognition. The brand also controls how it represents and uses its story to produce a brand experience, using the store's physical assets and products, and one-on-one interactions between brand ambassadors and consumers.

**Table 2. Comparison of Australian distribution and retailing channels for chocolate**

Channel	Examples	Market penetration	Gross margin requirement	Stock rotation	Range	Customer-staff engagement
National supermarkets	Woolworths, Coles, Aldi	● ● ●	● ● ●	● ● ●	● ● ●	● ● ●
Independent chains	Metcash (IGA, Foodland)	● ● ●	● ● ●	● ● ●	● ● ●	● ● ●
Fine food and specialty stores		● ● ●	● ● ●	● ● ●	● ● ●	● ● ●
E-Commerce	Bean.Bar.You	● ● ●	● ● ●	● ● ●	● ● ●	● ● ●
Convenience stores		● ● ●	● ● ●	● ● ●	● ● ●	● ● ●
Branded stores		● ● ●	● ● ●	● ● ●	● ● ●	● ● ●

# Market entry strategies

There are four key market entry strategies available for Indonesian craft chocolate makers seeking to access Australian premium chocolate consumers.

## Strategy 1: Own storefront

Storefront sales leverage personal interactions and sensory experiences, while online sales capitalise on digital tools, personalisation, and convenience. Successful brick-and-mortar premium food retailing businesses tend to take advantage of these differences and create an integrated, customer-centric approach that leverages the strengths of both channels.

Some broad findings that may help in initial considerations for a storefront include:

<b>Location</b>	Choose a location with a large market of potential premium chocolate consumers. Melbourne is currently the most supportive market for premium chocolate, with Sydney also a possibility. Other centres could be considered but have much smaller typical market sizes/densities.
<b>Customer interaction</b>	A key benefit of a storefront is the potential to interact with customers and engage them in the story behind products, including by offering interactive activities like tasting, pairing or production workshops. The design/layout of potential storefronts should include consideration of these aspects as a mechanism to improve value and chances of success.
<b>Customer engagement</b>	Social media and customer engagement activities are very important in the Australian market. Establishing a database of potential consumers, active social media profiles and newsletters, and other community engagement activities (e.g. blogs, factory tours, allowing visitors to make their own chocolate, etc.) can help to increase loyalty and repeat visitation to the storefront.
<b>Popup stores</b>	Popup stores can be an option to trial brick-and-mortar approaches. These opportunities will need to be explored with a range of different event organisers, weekend markets, or community centres.

## Strategy 2: Partnership with retailer

Selling directly to specialty gourmet food retailers requires careful consideration of branding, product assortment, targeted market, pricing, packaging, promotional support, and compliance requirements. Building strong relationships with retailers that align with your brand, and offering a product that stands out in quality and appeal, will be key to success. This can involve substantial investment in relationship building, again with no guarantee of success.



A few important attributes to consider that can increase your opportunity to obtain a stocking agreement with a specialty retail chain include:

<p><b>Varieties</b></p>	<p>Retailers often prefer to have a variety of options in products to cater to different customer preferences. Offering a variety of chocolate bars can make your brand more appealing to retailers. Some independent retailers are interested in exclusive or unique products that set them apart from competitors, so a niche or specialised offering can also be valuable. International accolades from chocolate competitions or past/present export successes can greatly boost the confidence of the retail chain. At the same time, ensuring consistency amongst your offering is important to reduce the ‘choice burden’ of both your chosen stockist and their consumers. It may help to have two or more different ranges with specific characteristics that can assist your chosen retailer in selling your product.</p>
<p><b>Packaging and presentation</b></p>	<p>Consider the retailer’s aesthetic and how your product will be presented to consumers. Will it be in a horizontal stack, vertically presented? Incorporating shelf-ready packaging (SRP) in your offering will make a difference to you, the retailer and the consumer, by ensuring products are packaged in a way that facilitates stocking and sale by the retailer (Figure 7).</p>
<p><b>Pricing strategy</b></p>	<p>Craft chocolate often has a higher price point. Understanding how your pricing aligns with a retailer’s customer base is essential. You’ll need to ensure that your pricing allows for the retailer’s markup while remaining competitive in their market.</p>
<p><b>Promotional support</b></p>	<p>Aligning with retailers that fit your chocolate brand’s image and values is essential. It ensures your chocolate reaches the right audience and maintains its unique appeal.</p>
<p><b>Choosing the right retailers</b></p>	<p>Aligning with retailers that fit your chocolate brand’s image and values is essential. It ensures your chocolate reaches the right audience and maintains its unique appeal.</p>

**Figure 7. Shelf-ready packaging examples**



## Strategy 3: Partnership with distributor

Australia's food and chocolate markets have diverse consumer preferences across regions and retail channels. Understanding the premium chocolate market landscape is challenging, especially if you are new to the market. Collaborating with a gourmet food distributor can assist in maximising sales and allow for rapid learning about consumer expectations in the Australian market.

A few attributes are important to distributors:

<b>Strong brand</b>	Showing that your brand has a strong brand, demonstrated through great packaging, an online presence, and success in your home or other export markets, conveys trust and quality that appeal to the distributor.
<b>Varieties</b>	Similar to retailers, distributors often prefer to have a variety of options to choose from to cater to different customer preferences (e.g. vegan, ethical, sustainable) but will generally only carry the options with the most potential for their network.
<b>Pricing strategy</b>	Distributors act as the middleman between the brand and the retailers. This additional layer in the supply chain may impact your margins but increase the volume of products sold. You will need to ensure that your pricing allows for distributor and retailer markups while remaining competitive in their specific market.
<b>Legal and compliance issues</b>	Ensure that your products meet all relevant regulations and standards for the markets you are looking to enter. This can include labelling requirements, food safety standards, and certifications. Distributors will be able to assist before importation.
<b>Supply</b>	Distributors often work with multiple brands and are more likely to prioritise the brands that consistently meet their supply needs. Brands that fail to deliver on time may risk losing distributor loyalty and shelf space in retail stores. Retailers do not want to be out-of-stock as it leads to dissatisfied customers who might turn to competitors.
<b>Brand trust</b>	Consistency in supply builds trust between brands and distributors. When distributors can rely on a brand to fulfil orders consistently, they are more likely to establish long-term partnerships and invest in marketing and promoting the brand's products. It also reflects positively on the brand's reputation.
<b>Cost efficiency</b>	Maintaining a stable supply chain can lead to cost efficiencies. You can negotiate better terms with suppliers, reduce rush orders, and minimise expediting costs when the supply chain operates smoothly.
<b>Advertising and promotions</b>	Advertising and promotions covers a wide range of activities, such as price promotions, tasting, bonus stock, incentives, press advertising, and trade show representations. These expenses can be incorporated into the distributor's margin but they may also be additional. If these costs are additional, you must ensure that the negotiated transfer price gives them enough gross margin to finance advertising and promotion expenses that are necessary to ensure your brand's success in the market.

## Strategy 4: E-commerce

Leveraging e-commerce platforms and online marketing can provide access to a wider Australian audience and allow direct consumer engagement. However, selling from the brand's production/warehousing platform in Indonesia to Australian consumers is unlikely to be successful due to logistical difficulties, product degradation when shipped as small lots, shipping delays and shipping costs.

Incorporating e-commerce into your market-entry strategy is crucial for various reasons:

<b>Global reach</b>	E-commerce enables market entry without the need for a physical presence in the target market.
<b>Cost-efficiency</b>	While brick-and-mortar storefronts have great advantages, they can be costly to establish and maintain, while e-commerce requires lower investment, making it more cost-effective for small businesses.
<b>Market and consumer insights</b>	E-commerce provides valuable data on consumer behaviour and preferences. Analysing this data will help the brand make informed decisions on their offering and positioning.
<b>Flexibility</b>	Brands can adjust range offerings, pricing, and marketing strategies in real-time to stay relevant and competitive to their customers.
<b>Customer engagement</b>	Building customer relationships is essential for successful market entry. Tools like the brand's website, social media and email marketing are crucial to tell the brand's story, present the offering, and interact with consumers.

## Comparison of strategies

Investing in a retail storefront has the most potential to increase brand awareness, provide for direct customer engagement, build loyalty and more. On the other side, it is relatively low-cost to build e-commerce websites and there are a range of freight/logistics companies that can support the development of an online storefront facilitating a Direct To Consumer model.

We reviewed two indirect market entry pathways, the first through specialty and gourmet food retailers and the second through specialty and gourmet food distributors (Table 3). These two approaches are similar in cost, value, and risks, and both would be good options for bean-to-bar producers with a mature product range. The retailer approach is likely to be better suited to smaller producers, while distributors may be better suited to larger producers who can meet quantity and range requirements for larger-scale distribution.

**Table 3. Comparison of integration pathways in premium chocolate markets in Australia**

Aspect	Physical storefront	Partnership with food retailer	Listing with distributor	E-Commerce
Brand awareness	● ● ●	● ● ●	● ● ●	● ● ●
Direct consumer engagement	● ● ●	● ● ●	● ● ●	● ● ●
Brand loyalty	● ● ●	● ● ●	● ● ●	● ● ●
Costs (labour, operational and compliance)	● ● ●	● ● ●	● ● ●	● ● ●



# Key considerations for Indonesian businesses

Australia has a strict biosecurity regime, as well as comprehensive food safety and food labelling legislation. Agricultural and food commodities are closely scrutinised under a range of legislative instruments. Australia takes biosecurity more seriously than many countries and has one of the most aggressively enforced border security programs in the world.

## Australian import requirements

Key risks facing agri-food product importers include:

- Destruction of goods that fail biosecurity inspection, including due to the presence of notifiable pests or incomplete or incorrect paperwork. In effect, even if your product is actually free of important pests but the paperwork is non-compliant, your product is likely to be destroyed.
- Forcible withdrawal of non-compliant food products from sale, requiring either relabelling or destruction (depending on your ability to relabel).
- Initiation of legal cases for failure to declare the presence of allergens on food labels.

Australian consumers take food labelling seriously, and businesses that fail to comply with food labelling and production laws run the risk of becoming well-known for unenviable reasons.

The Australian Government Department of Agriculture, Fisheries and Forestry (DAFF) is the core government department that deals with importation of food and agricultural products. It provides substantial information on importing food products on its website.

In general, there are a small number of steps that importers should move through before initiating the export of their agri-food products to Australia. These include:

<b>Research</b>	Check the DAFF website, especially the 'Importing goods' page and Australia's Biosecurity Import Conditions system (BICON; <a href="https://bicon.agriculture.gov.au/">https://bicon.agriculture.gov.au/</a> ) to determine if the goods you intend to import are permitted. If they are permitted, BICON can provide the key needs for your product to clear Australian customs checks. It will also provide a series of steps you need to undertake to pass legislative needs (e.g. a declaration must be made to the Australian Border Force).
<b>Check whether you need an import permit</b>	Depending on the goods, an import permit may be required. This should also be checked through BICON.
<b>Food standards</b>	For food products, you must ensure that your product meets the standards outlined in the Australia New Zealand Food Standards Code.
<b>Labelling</b>	Imported food must meet Australia's labelling standards. Labels must include information like ingredients, country of origin, etc.

The following sections outline the legislative requirements for importing cocoa beans, ready-to-eat, and other production into Australia. These sections provide general, indicative information only, that was up-to-date at the time of report completion. In no way should the information in the following sections be construed as legal advice for importing products into Australia. Businesses should seek their own advice and should check the BICON site for current information prior to shipping/importation. It is also good practice to subscribe to your product type on the BICON site if you intend to undertake regular importation activities.

## Protocols for raw, fermented, dried cocoa beans




Cocoa bean imports are treated as an agri-food commodity and are subject to the Biosecurity Control Act (2015) and the Imported Food Control Act (1992). Two main sources can be checked for the requirements for importation of cocoa beans:

- The 'Importing Goods' page provides an overview

of the process for the importation of agri-food products (amongst others)

- The BICON page is specifically associated with goods that are deemed to fall under the Biosecurity Control Act (which cocoa beans do, but chocolate does not).

Businesses seeking to import raw, fermented or dried cocoa beans into Australia should consider three key points:

 <p>Review the relevant BICON page if you are importing cocoa beans or other cocoa products.</p>	 <p>Using an import agent, and engaging them before export of your product from Indonesia, is highly advisable.</p>	 <p>You should request confirmation from your export/import agent whether you need a phytosanitary certificate or not. If you do need one, you should check with DAFF or your import agent that the certificate is appropriate for current requirements prior to shipment.</p>
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Our review of these sites, combined with our own expertise and that of our experts provided a short summary of requirements for the importation of cocoa beans to Australia. These are summarised below:

Requirements	Examples
<p>Ensure you are aware of, and have met, all biosecurity requirements to prepare for raw, fermented and dried cocoa beans before shipping. Find details on the BICON site.</p>	<p>At time of writing, an import permit is not currently required for raw, fermented or dried co-coa beans. However, this should be reviewed before each time you seek to export cocoa beans to Australia.</p>
<p>Prior to export, the goods must be inspected and found free from evidence of any Trogoderma species of biosecurity concern, including khapra beetle (<i>Trogoderma granarium</i>). You must present a valid Phytosanitary certificate to demonstrate compliance. Failure to do so may result in destruction of your goods on arrival in Australia. You should review the requirements for the phytosanitary certification before each export activity as requirements are subject to change. A good strategy is to subscribe to notifications regarding cocoa bean exports.</p>	<p>Recent changes require the use of a specific declaration: "Representative samples were inspected and found free from evidence of any species of Trogoderma (whether live, dead or exuviae)." In the last 12 months, there have been cases of exporters/importers being unaware of this change and facing difficulties importing their products.</p>

Goods must be clean and free of contaminant seed, soil, animal and plant debris and other biosecurity risk material prior to arrival in Australian territory.

Each consignment of goods must be packed in clean and new packaging.

Contamination with other seeds and soil must not exceed the tolerances, as listed in the Department standards for seed contaminants and tolerances.

Shipments must apply for inspection services

This is an abbreviated list of requirements to import cocoa beans to Australia. An import or customs agent will assist with navigating these requirements. If you are seeking to organise the import process yourself, it is highly recommended you seek additional expert advice prior to export to ensure you have met all requirements and are ready to deal with a rapid turn-around of your hired container during the customs assessment process. Without an agent you will need to register for at least the Cargo Online Lodgement System and Australia's Biosecurity Portal, but other registrations may be required. It is also important that you are prepared to move your shipment out of the assessment holding warehouse rapidly, to avoid penalty fees. Most of these activities can be achieved efficiently by using a customs agent.



## Protocols for ready-to-eat food products

Chocolate imported into Australia for human consumption must follow Australian legal requirements and regulations regarding food safety, hygiene and food labelling. Labelling of food for sale is subject to strict regulations which are detailed in the Australia New Zealand Food Standards Code. The code also covers other food product matters, including maximum levels of contaminants (e.g. heavy metals and mycotoxins), food additives, and microbiological limits. The import of food products is dealt with separately in the Imported Food Act 1992.

Businesses seeking to import ready-to-eat food products, like chocolate, into Australia should consider the requirements for importing ready-to-eat products to Australia outlined by Food Standards Australia New Zealand (FSANZ).

Compliant labelling is a basic requirement for importing ready-to-eat products. You should consider getting advice on labelling requirements before you first import to Australia. Any food product sold as a retail product (or that is ready for retailing) must bear a compliant label, including chocolate, with some exceptions:

- Products made, packaged and sold on the same premises (e.g. a bean-to-bar maker who sells chocolate products from their factory).
- Products 'made fresh' and for immediate consumption at the place of production or as a takeaway product (e.g. a chocolatier selling truffles for consumption on the premises or as a takeaway snack).

Food Standards Australian New Zealand is an independent statutory agency established by the Food Standards Australia New Zealand Act 1991. Like BICON, it is the key site for information on food product legislation, including allowable ingredients, notifiable concerns, and labelling.

Labels must identify:

Label requirement	Details
Name of the food	
List of ingredients	The list must include any ingredient that constitutes more than 5% of the final product. Ingredients must be listed in descending order of importance in terms of weight in the final food.
Nutritional information panel	A detailed description of the product's nutritional information.
Allergen declarations for any potential allergen	All potential allergens must be declared, even if it is less than 5% of the final product.
Date markings	All labels must include either a use-by date or a best-before date: <ul style="list-style-type: none"> <li>• Foods that must be eaten before a certain time for health or safety reasons should be marked with a use-by date. Foods should not be eaten after the use-by date, and can't legally be sold after this date because they may pose a health or safety risk.</li> <li>• Most foods have a best-before date. Food should still be safe to eat for a short time after the best-before date, but quality may reduce. Foods with a best-before date can legally be sold after that date provided the food is fit for human consumption.</li> </ul>
Country of origin labelling	Country of original labelling is dealt with under separate, more recent, legislation.
Measurement marks (net weight)	A detailed description of the product's nutritional information.
The name and street address of the manufacturer, packer, distributor or importer	This must be a physical address, not a post office box or otherwise.
Any specific claims made about the product (e.g., 'organic', 'fair trade', 'gluten-free') must comply with the relevant standards	For example, 'organic' labelling claims are regulated and must comply with the Australian Certified Organic Standard.

These requirements are enforceable and involve some complexity in ensuring their validity (e.g. determining entries for the Nutritional Information Panel). We advise obtaining formal assistance from a food labelling expert to reduce the risks of failing to meet legislative requirements.

## Cadmium limit and traceability

Both bean-to-bar producers and large-scale chocolate companies need to focus on food safety, especially concerns over cadmium, mycotoxins, and pesticide residues in cocoa beans sourced from origin countries. The spotlight on cadmium has intensified following two studies by the non-profit organisation, Consumer Reports. Their investigations, published in 2022 and 2023, found high levels of cadmium in 16 out of the 48 chocolate products tested. Cadmium, a heavy metal, is taken up by cacao trees from the soil. Its presence in food is concerning because it can lead to health issues such as kidney damage, weakened bones, and increased cancer risk.

Currently, food safety regulations target cadmium levels in products produced with cocoa, rather than the cacao beans directly. The European Union and Australia were among the first to establish limits for cadmium in chocolate and cocoa powders in food more than a decade ago, with FSANZ setting a limit of 0.5 milligram per kilogram of chocolate and cacao product in Australia. (In Indonesia, the maximum limit on cadmium is 0.5 milligram per kilogram of chocolate and cacao product). Regulations in Indonesia and Australia are roughly the same as new European regulations for processed chocolate with over 30% cacao.

Because cadmium levels are set for cocoa products rather than beans specifically, the chocolate industry creates their own standards for beans. This means that when translating the cadmium level regulations to cocoa beans, buyers use different approaches to calculate the acceptable levels. These levels may vary according to their individual risk management system and their end-buyer's requirements, but in general, importers consider less than 0.5 parts per million to be acceptable.

In this context, traceability has been a significant issue for the chocolate and cacao industry especially in the last five years, with rapid growth and innovation. Traceability programs seek to resolve information and credibility problems by ensuring that regulators, downstream supply chain actors, investors, consumers, and other stakeholders can easily assess a food supply chain in terms of food safety, ethics (e.g. 'fair' payment), environmental sustainability, and regulatory expectations.

Traceability is often described as a consumer-driven concern. The reality is, however, that consumer perceptions drive the interest in traceability only for some, typically boutique, chocolate producers. The larger driver, by far, is increasing and emerging



regulation around supply chain transparency (e.g. the European Union Deforestation Regulation) and from investors and stakeholders in large supply chain companies who are increasingly calling for transparency to support environmental, sustainability, and governance claims.

Bean-to-bar producers are more likely to rely on direct-to-consumer retailing models, although not exclusively. However, their approach to communicating ethics and quality relies more on informal approaches to transparency. In many cases, bean-to-bar producers can provide data over their purchase program but tend to rely heavily on 'storytelling' around their approach to procurement, production, packaging and other characteristics. Furthermore, there is limited digitisation of supply chains operated by small boutique chocolate producers currently. Formal traceability systems, particularly for identity-preserved products, remain rare due largely to the limited penetration of high-fidelity traceability systems and the early stage of digital technology development to increase representation of those.

Please refer to Annex 4 for various traceability programs that are available.

## Opportunities

The key opportunities for Indonesian premium chocolate producers are associated with leveraging and contributing to growing awareness among Australian consumers regarding Indonesia as a source of premium chocolate. This awareness flows through to wholesalers and retailers who will be more likely to actively seek Indonesian premium chocolate products to stock, or, at least, be more open to offers of partnership.

In terms of the Australian market in general (i.e. not specific to Indonesian-sourced chocolate), there is a range of trends and/or characteristics that may be leveraged as opportunities by Indonesian premium chocolate producers, including:

Trends	Strategies
<p>Approaches that can assist in realising opportunities from increasing importance of certification on the willingness of consumers to purchase premium products.</p>	<p>Obtaining certifications like Fair Trade, Organic, or Rainforest Alliance can signal ethical and sustainable practices to Australian consumers, enhancing the appeal of Indonesian chocolate.</p>
<p>Growing interest in connection to producers through product 'stories', especially when those stories are linked to the experiences of target consumers (e.g. tourists).</p>	<p>Partnering with Australian artisans and chocolatiers to help introduce Indonesian chocolate to local consumers and create unique chocolate products for the market.</p>
<p>A strong preference for milk-based chocolate products that are associated with specialist products from the same producer, recognising that brand recognition plays a major role in consumer decisions in Australia.</p>	<ul style="list-style-type: none"> <li>• Experimenting with unique flavours and ingredients, such as Indonesian spices and tropical fruits, can set Indonesian chocolate apart in the Australian market.</li> <li>• Entering chocolate competitions and highlighting awards and accolades, to support the growth of Indonesian premium chocolate by assuring buyers of the chocolate's quality and excellence.</li> </ul>
<p>Increasing use of mixed retail strategies, including online retailing combined with seeking retail and distribution strategies.</p>	<ul style="list-style-type: none"> <li>• Seeking to build brand awareness through more easily accessible cohorts, such as Australian tourists visiting Indonesia.</li> <li>• Leveraging e-commerce platforms and online marketing can provide access to a wider Australian audience and allow for direct consumer engagement.</li> </ul>

# Annex 1 Chocolate brands sold in Australian national supermarkets

The below table sets out a range of chocolates available in Australian national supermarkets at November 2023. Pricing reflects shelf price, not promotional price. It is important to note that these prices are not wholesale prices and retail margins can greatly vary, although are generally expected to be between 10 to 45%.

Brand	Product description	Positioning	Weight (g)	Recommended retail price (AUD)	AUD/100g
Bennetto	Chocolate Intense Black 75%	Organic/Fairtrade/ Vegan	100	6.99	6.99
Cadbury	Old Gold Original Dark Chocolate	Chocolate for all/ Accessible	180	5.50	3.06
Darrell Lea	Belgian Dark Chocolate 70%	Accessible	100	2.50	2.50
Green & Black's	Organic 70% Dark Chocolate	Organic/Fairtrade	90	4.50	5.00
Lindt	Lindor Dark Chocolate	Premium Swiss	100	5.50	5.50
Lindt	Excellence Dark Chocolate 70%	Premium Swiss	100	5.50	5.50
Loving Earth	72% Dark Chocolate	Raw/Organic	80	6.90	8.63
Pana Organic	Dark Hazelnut Chocolate	Organic/Gluten-free/Dairy-free	45	6.00	13.33
Pico	Super Dark	Vegan/Organic/ Fairtrade	80	7.00	8.75
Tony's Chocolonely	Dark Chocolate 42% Pretzel	100% Slave-free	180	8.00	4.44
Well Naturally	Dark Chocolate No Sugar Added	Sugar-free	45	3.15	7.00
Whittaker's	Dark Ghana	Bean-to-bar	250	6.90	2.76

## Annex 2 Chocolate brands sold in Australian specialty stores

The below table sets out a range of chocolates available in Australian speciality stores at November 2023. Pricing reflects shelf price, not promotional price. It is important to note that these prices are not wholesale prices and retail margins can greatly vary, although are generally expected to be between 10 to 45%.

Brand	Product description	Positioning	Weight (g)	Recommended retail price (AUD)	AUD/100g
Alter Eco	Dark Chocolate Sea Salt	Organic/Fairtrade/Sustainability	80	5.49	6.86
Alter Eco	Classic Black 85%	Organic/Fairtrade/Sustainability	80	5.99	7.49
Alter Eco	Super Blackout 90%	Organic/Fairtrade/Sustainability	75	5.99	7.99
Bahen & Co.	Papua New Guinea 70%	Bean-to-bar	75	9.90	13.20
Bahen & Co.	Vietnam 75%	Bean-to-bar	75	9.90	13.20
Bennetto	Dark Chocolate Hazelnut 60%	Organic/Fairtrade/Vegan	100	9.95	9.95
Bennetto	Dark Chocolate Amaranth 60%	Organic/Fairtrade/Vegan	100	9.95	9.95
Bennetto	Chocolate Intense Dark 75%	Organic/Fairtrade/Vegan	100	9.95	9.95
Jasper + Myrtle	Papua New Guinea 66%	Bean-to-bar	65	10.50	16.15
Koko Black	Step Into The Dark 54%	Premium/Australian native ingredients	90	10.99	12.21
Monsieur Truffle	Dark 100% Ecuador	Organic/Handmade/Gluten-free	80	12.99	16.24
Monsieur Truffle	Dark Hazelnut Caramel	Organic/Handmade/Gluten-free	80	12.99	16.24
Pana Chocolate	50% Cocoa Ha-zelnut	Organic/Handmade/Gluten-free	45	7.40	16.44
Pana Chocolate	Chocolate Mint	Organic/Handmade/Gluten-free/Dairy-free	45	7.40	16.44



Brand	Product description	Positioning	Weight (g)	Recommended retail price (AUD)	AUD/100g
Pico Chococlote	Super Dark 85%	Vegan/Organic/Fairtrade	80	6.99	8.74
Ratio Cocoa Roasters	Vanuatu Dark Chocolate	Bean-to-bar	70	12.00	17.14
Ratio Cocoa Roasters	Venezuela Dark Chocolate 75%	Bean-to-bar	70	12.00	17.14
Tony's Chocolonely	Dark 70%	100% Slave-free	180	8.00	4.16
Tony's Chocolonely	Dark Almon Sea salt	100% Slave-free	47	3.09	6.57

# Annex 3 Australian ‘bean-to-bar’ producers

Companies	Location	Website
Alouss Chocolate	Sydney, NSW	<a href="http://www.alouss.com">www.alouss.com</a>
Atypic Chocolate	Melbourne, VIC	<a href="http://www.atypic-chocolate.com.au">www.atypic-chocolate.com.au</a>
Bahen & Co	Margaret River, WA	<a href="http://www.bahenchocolate.com">www.bahenchocolate.com</a>
Bird Snake	Melbourne, VIC	<a href="http://www.birdsnake.com.au">www.birdsnake.com.au</a>
Cabosse & Feve Chocolates	Castlemaine, VIC	<a href="http://www.cabosseandfeve.com.au">www.cabosseandfeve.com.au</a>
Cailo Chocolate	Perth, WA	<a href="http://www.cailochocolate.com">www.cailochocolate.com</a>
Charley’s Chocolate Factory	Mission Beach, QLD	<a href="http://www.charleys.com.au">www.charleys.com.au</a>
Chocolate DR	Coffs Harbour, NSW	<a href="http://www.chocolate-dr.square.site">www.chocolate-dr.square.site</a>
Chocolado	Sydney, NSW	<a href="http://www.chocolado.com.au">www.chocolado.com.au</a>
Chocolate by Peter M (previously Cravve)	Burleigh Heads, QLD	<a href="http://www.chocolatebypeterm.com.au">www.chocolatebypeterm.com.au</a>
Cuvée Chocolate	Carrum Downs, VIC	<a href="http://www.cuveechocolate.com.au">www.cuveechocolate.com.au</a>
Elements Chocolate Co.	Perth, WA	<a href="http://www.elementschoc.com.au">www.elementschoc.com.au</a>
Federation Chocolate	Taranna, TAS	<a href="http://www.federationchocolate.com">www.federationchocolate.com</a>
Gabriel Chocolate	Yallingup, WA	<a href="http://www.gabrielchocolate.com.au">www.gabrielchocolate.com.au</a>
Good Boy Chocolates	Melbourne, VIC	<a href="http://www.goodboychocolate.com">www.goodboychocolate.com</a>
Haigh’s Chocolates	Adelaide, SA	<a href="http://www.haighschocolates.com.au">www.haighschocolates.com.au</a>
Hark Chocolate	Adelaide, SA	<a href="http://www.harkcoffee.com.au">www.harkcoffee.com.au</a>
Hunted & Gathered	Melbourne, VIC	<a href="http://www.huntedandgathered.com.au">www.huntedandgathered.com.au</a>
Hyggelig	Sydney, NSW	<a href="http://www.hyggelig.com.au">www.hyggelig.com.au</a>
Jasper & Myrtle	Canberra, ACT	<a href="http://www.jasperandmyrtle.com.au">www.jasperandmyrtle.com.au</a>

Companies	Location	Website
Just	Lawson, NSW	<a href="http://www.meltdownartisan.com">www.meltdownartisan.com</a>
KKao (previously 17 Rocks)	Brisbane, QLD	<a href="http://www.kkao.com.au">www.kkao.com.au</a>
Kiama Chocolate Factory	Kiama, NSW	<a href="http://www.kiamachocolatecompany.com.au">www.kiamachocolatecompany.com.au</a>
Living Koko	Melbourne, VIC	<a href="http://www.LivingKoko.com">www.LivingKoko.com</a>
Loving Earth	Melbourne, VIC	<a href="http://www.lovingearth.net">www.lovingearth.net</a>
Metiisto	Toowoomba, QLD	<a href="http://www.metiistochocolate.com.au">www.metiistochocolate.com.au</a>
Monsieur Truffe	Melbourne, VIC	<a href="http://www.monsieurtruffechocolate.com">www.monsieurtruffechocolate.com</a>
Mork (Hot chocolate)	Melbourne, VIC	<a href="http://www.morkchocolate.com.au">www.morkchocolate.com.au</a>
Mama Dulce	Melbourne, VIC	<a href="http://www.mamadulce.com.au">www.mamadulce.com.au</a>
Origin Chocolate	Orange, NSW	<a href="http://www.originchocolate.com.au">www.originchocolate.com.au</a>
Pain et Chocolat	Trentham, VIC	<a href="http://www.atelierchocolat.com.au">www.atelierchocolat.com.au</a>
Ratio Cocoa Roasters	Melbourne, VIC	<a href="http://www.ratiococoa.com.au">www.ratiococoa.com.au</a>
South Pacific Cacao	Haberfield, NSW	<a href="http://www.southpacificcacao.com">www.southpacificcacao.com</a>
Spencer Cocoa	Mudgee, NSW	<a href="http://www.spencercocoa.com.au">www.spencercocoa.com.au</a>
Two Lost Pilots	Perth, WA	<a href="http://www.twolostpilots.com.au">www.twolostpilots.com.au</a>
Wood fire chocolate maker	Mandurah, WA	<a href="http://www.woodfirechocolate.com">www.woodfirechocolate.com</a>
Zokoko	Emu Plains, NSW	<a href="http://www.zokoko.com">www.zokoko.com</a>

# Annex 4 Digital traceability programs developed for cocoa supply chain

Platform	Categorisation	Description	Users
'Beantracker' by Chain-Point	Identity-preserved bean traceability program	Focused on beans from Ghana and Ivory Coast, the 'beantracker' system was developed by ChainPoint for Tony's Chocolonely in collaboration with Barry-Callebaut, which manages procurement and shipping.	Tony's Chocolonely
'Marketplace 2.0' (Rain-forest Alliance)	Supports identity-preserved bean traceability. Rainforest-Alliance specific certification integration.	A supply chain traceability program developed specifically for the Rain-forest Alliance certification program. It is multi-commodity (not just cocoa) and was developed by ChainPoint for Rainforest Alliance.	Rainforest Alliance
Koltiva ('KoltiTrace')	A general traceability system with multiple capabilities. It is unclear if KoltiTrace has direct verification integrations with existing certification programs.	An Indonesian-owned comprehensive web and smartphone-based digital supply chain traceability program, that incorporates multiple farm utility applications (e.g. smart-farming, digital payments/credit, input markets).	Multiple users
"Katchilè" by SAP and Barry Callebaut	A cocoa beans-specific traceability program aiming for identity-preserved traceability up to export.	Katchile integrates farmer support functions, sustainability insights and seeks to improve the assessment of impact on cocoa farmers and cocoa producing communities.	Barry-Callebaut proprietary (provided by SAP).

## Annex 5 List of business contacts in the Australian food supply chain


Platform	Categorisation	Description
Terra Madre	Health-conscious food Wholesaler & two stores Sells sustainable, premium foods Based in Melbourne	<a href="http://www.terramadre.com.au">www.terramadre.com.au</a>
Honest to Goodness	Health-conscious food Based in Sydney Organic and natural foods Wholesaler, distributor, and direct-to-consumer	<a href="http://www.goodness.com.au">www.goodness.com.au</a>
Royal Foods	Specialty/Fine Food National distributor Based in Melbourne	<a href="http://www.royalfoods.com.au">www.royalfoods.com.au</a>
Food Nation	Specialty/Fine Food Gourmet food wholesaler based in Adelaide Services South Australian gourmet stores	<a href="http://www.foodnation.com.au">www.foodnation.com.au</a>
Gourmet Brands	Specialty/Fine Food Based in Victoria Supplies Australia's leading major grocery stores and independent stores	<a href="http://www.gourmetbrands.com.au">www.gourmetbrands.com.au</a>
Faire	Specialty/Fine Food Gourmet food online business-to-business marketplace Sells to independent stores All suppliers must have a third party logistics warehouse system	<a href="http://www.faire.com">www.faire.com</a>
Le Petit Gourmet	Specialty/Fine Food Based in Capalaba, Queensland Wholesaler and distributor	<a href="http://www.lepetitgourmet.com.au">www.lepetitgourmet.com.au</a>
Bio Living	Specialty/Fine Food Wholesale distributor of natural foods Based in Melbourne	<a href="http://www.bioliving.com.au">www.bioliving.com.au</a>



Platform	Categorisation	Description
Satisfine Foods	Chocolate focused Based in Matraville, New South Wales Chocolate and confectionery wholesaler	<a href="http://www.terramadre.com.au">www.terramadre.com.au</a>
Wholefoods Merchants	Health-conscious food Five stores across Melbourne Wholefood ethical sustainable range	<a href="http://www.goodness.com.au">www.goodness.com.au</a>
Aunt Maggies	Health-conscious food Three stores in Victoria	<a href="http://www.royalfoods.com.au">www.royalfoods.com.au</a>
The essential ingredient	Specialty/Fine Food Seven stores across Victoria, New South Wales and Australian Capital Territory Upmarket, sells premium imported foods Typically reviews their range at the end of the calendar year Smaller groups of franchisees within the banner	<a href="http://www.foodnation.com.au">www.foodnation.com.au</a>
The Reddrop group	Specialty/Fine Food 22 stores in Victoria, covering the Grocer, Foodworks and IGA banners	<a href="http://www.gourmetbrands.com.au">www.gourmetbrands.com.au</a>
Oasis	Specialty/Fine Food Quality imported and Australian foods Three stores in Victoria, one in New South Wales Wholesaler, retailer, direct-to-consumer	<a href="http://www.faire.com">www.faire.com</a>
Bean.Bar.You	Chocolate-focused Online chocolate subscription service offering the world's best bean-to-bar chocolates to Australian consumers Has experience selling Indonesian chocolates	<a href="http://www.lepetitgourmet.com.au">www.lepetitgourmet.com.au</a>



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