

34. According to recent ABS statistics small businesses in Australia are the real job generators. Small business employment take-up has been of the order of 5.3% per year since 1983-84<sup>26</sup>. Conversely, the average annual growth of small business entities has been a net 3.5% over the same period. Viewed from another perspective, employment in the small business sector has recorded an increase of 50% in 13 years, an annual average rate of 3.2%<sup>27</sup>.

35. Of particular significance is that the number of small employing businesses have been increasing steadily. There was particularly strong growth over the three years 1993-94 and 1995-96, an increase of 26%, which represents an annual average growth rate of 8.0%. The small business sector now commands 50.2% of our total private sector employment.<sup>28</sup>

36. Thus, based on the clear evidence of ABS statistics, we believe we are justified in asserting that as a matter of fact, both micro and small businesses are a vital part of the Australian economy<sup>29</sup>.

37. This arises not only because of the high proportion of businesses in the economy which are micro or small businesses, but more importantly because of their general contribution to the Australian economy in terms of naked job creation:

*Small business has contributed 1.1 million jobs of 1.2 million jobs created in the past decade (since 1984/85)*

Prime Minister John Howard, Federal Government's Response  
to the Deregulation Task Force 1997

but also in the encouragement of new business activity, seeking to keep alive and reinforce the growth of an entrepreneurial culture –giving it a go, not leaning back on the bootstraps of social welfare. In essence a very important role, given that academic studies such as the Karpin Report have identified Australia's lack of a strong entrepreneurial culture, as a major barrier to economic growth and development.

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<sup>26</sup> Opcit. ABS pp 17.

<sup>27</sup> Ibid pp 17.

<sup>28</sup> Ibid pp 18.

<sup>29</sup>For instance 66% of Tasmania's private sector workforce is engaged in small business activities, 80% of the small businesses are micro-businesses, and no less than 85% of the employees employed in the retail sector, work in small business operations.

38. It is from these perspectives and other statistical indicators,<sup>30</sup> that we hold to the view that contrary to whatever the public relation spinners of the large corporations may present to government, it is our *small businesses which are the backbone of Australia's economy*, and therefore **find it perplexing in terms of representation that it has not been properly represented on key policy determiners such as the NCC in the past.**

39. As a result small business operators have, unnecessarily, in our view, suffered most by the implementation of the micro-style economic strategies put in place by directives from the NCC. These strategies have subsequently proved to be contrary to the best interest of rural and regional communities, and therefore from our perspective, contrary to the nation's public benefit.

40. Further, given small business operators generally learn the basics and mechanics of operating their business experimentally, while developing their first business venture, **it has been regrettable that in pursuing a micro-focus the NCC has failed to appreciate the strategic importance of a more grass-roots-based government-sponsored mentoring service for Australia's quiet achievers**, its hard-working, high risk-taking small business sector.

## **VI NCC –Saviour or Public Health Hazard?**

### **Background:**

40. As members of the public, it is very important that we remain focused on the reality (prior to passing judgment on the performance or non-performance of the NCC), that it was conceived in those halcyon days when statements such as 'banana republics' were political buzz words; we had a Federal Treasurer seeking international acclaim for his accountancy skills; a mini recession that bit deep in early 1991, which in turn prompted a strong riposte from the Prime Minister of the day that it was a recession *we had to have*; and there were general concerns in some quarters as to the need for Australia on the manufacturing front to lift its productivity, if it was to compete effectively in the international export arena.

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<sup>30</sup> The following key performance indices illustrate this fact:

- In 1996-97 some 932,400 persons worked in their own business [ABS – *Small Business in Australia* 1997 1321.0 pp35]. In the same period 50% of all non-agricultural private sector employment came from small business.
- Employment generated by smaller businesses follows a different pattern to that generated by large businesses. *Small businesses have a greater tendency to employ people on a full-time basis than large businesses, particularly in the retail sector.* Part-time employment is proportionately less important in small firms (accounting for about 17 per cent of employment) than for other sized firms [BLS. p11].
- Small Businesses tend to employ people of similar educational/cultural backgrounds to themselves. This tends to increase *range of employment in the community*, given losses in employment not often picked up other areas.
- Small businesses also offer an important source of employment for women. The proportion of women working in their own businesses is growing rapidly. In February 1995, there were 794,700 small businesses operated by 1.3

41. It is understandable therefore in such a hot-house of desired performance-based expectations, that the economic rationalists were seriously listened to and consequently had a field day. Not only in the creation (devoid of effective parliamentary scrutiny and debate), of an institution known as the National Competition Council (NCC), but also laid down the groundwork and dogma for its attendant policies, the National Competition Policy (NCP). Since the passing of the *Competition Policy Reform Act* in 1995, which came into being as a result of the 1993 Hilmer Report, the Council under the Chairmanship of Mr Graeme Samuel has gathered its own momentum, securing a futures commitment from the States for the review programs of a staggering \$16 billion of taxpayers money and with transparent arrogance appears to dictate with gay abandon to State Governments so that they bend to the Council's will in terms of their projected legislative reform schedules.

42. Such tight-fisted policies, which appear at times to be based on cold economic rationalism **and appear to take no account whatsoever as to the social consequences for local and regional and rural communities (where the concept of economies of scale cannot always be achieved), have not gone down well with both the politicians and members of the public alike.**

*'Coming out as he has this year, the tone of his comments can only be construed as threats to the states ahead of the delivery of their reviews, as bully boy tactics to the states, to the affected industries and to the professions concerned. He has left no-one out: Liquor regulations, newsagents, chemists – the back bone of small communities. Your call to deregulate destroys them. You transfer their business to large supermarkets in neighbouring towns and destroy the smaller town with its pub, newsagent, and chemist serving the local community.*

Senator Ron Boswell speech Hansard 13 May 1998 – Federal Senate

43. Certainly the very poor interface/public perception the NCC commands with the public at large is not helped by the certain loose-based statement made by its Chairman, which repeatedly seem to infer he pays scant regard for the valiant work done by the real job generators in Australia -the small business sector.

*'...while the small business sector is an important component of the economy and a large employer in aggregate, ensuring the viability of any particular small business should not be an aim of government policy'.*

Graeme Samuel

Speech –

Laying the Foundations For a More Productive Business Environment: Some Issues in Competition Reform.

Address to the Property Council of Australia April 1998

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million people. Women comprised one-third of these operators (that is 424,300). In terms of home-based businesses, 47% of the operators are women.

44. **Indeed there is now a groundswell of public opinion from both within and without Federal parliament which suggests that this government-sponsored quango needs to be brought accountable to both parliament and the electorates who have suffered for too long, particularly in rural and regional areas the blight of its anti-social, anti-community, anti-small business, anti-jobs policies.**

45. One of the principal areas of concern in this regard has been the abject failure of NCC to pay more than mere lip service to the concept as to what is in the *public interest* and what is of *public benefit*, and whenever considered such primary concerns are always regarded in the negative.

46. In other words, rather like the French inquisitorial justice system of being considered guilty unless you can prove innocence, what regional and rural communities have considered to be very much in the public interest (i.e. the keeping of their fragile community infrastructures intact in remote and regional areas), appear to be given short shrift in the eyes of the NCC in its headlong lemming-like rush towards de-regulation, **regardless of the cyclone of damage it may generate in terms of loss of local jobs small businesses, and quality of work to individuals in any area or activity.**

47. It is no wonder therefore as we come to the close of this year, that the NCC now has the special distinction of having not ONE but THREE Federal Government sponsored Inquiries lining up to skirt around the peripheries of **whether the Australian community at large should be asked to bear any further the theorist havoc created by just this one government service contrived Council**<sup>31</sup>.

48. Being essentially a representative of the small and independent grocers of Australia, NARGA has a very limited budget for research. It is therefore left to other far more auspicious bodies, to lay definitive judgment on how valuable or effective is the NCC's overall performance.

49. However, we can be definitive in one respect, our major concern as to the **failure of the NCC to provide a healthy and competitive trading environment in the retail sector, which has placed extreme pressure on our members, the majority of whom trade in rural and regional areas** and express our industry's view as to how at least we have perceived the performance of the NCC to have been in that area and make recommendations for the future.

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<sup>31</sup> They are this Inquiry, the recently closed Senate Inquiry and now, about to commence with across-party support, Joint Parliamentary Inquiry into Market Dominance in the retail sector.

50. In order to lay the foundations for our views it is meaningful that we now briefly review the history of the formation of the Council here as we understand it, and make certain observations along the way as to its performance as it relates to our members.

### **Observations:**

51. The National Competition Council is made up of members, all of whom are drawn from either academia or large business organisations in the private sector, and as (*Appendix 9*) illustrates from their vitae, appear to have little small business experience. To put it colloquially, they come from the *big end or ivoried towered sections of town*. Statements made by the Chairman, as highlighted earlier, merely seem to corroborate such an in-depth weakness in the make-up of the Council as presently constituted.

52. From a small business perspective, we find it perplexing that this high-stature body is **heralded as the watchdog** to ensure the best possible consumer service and supply outcomes<sup>32</sup> occur, **yet no action appears to be in train to ensure there is *real competition***<sup>33</sup> in the retail market place.

53. We suggest this reveals the major flaw in the façade of the economic-rationalists' theories:

*Proponents of extended trading hours will often make statements such as 'regulation provides protection from competition', basing one of their main arguments for further extension of trading hours on allowing market forces to decide and advocating 'laissez faire' economic policies, by removing government intervention.*

*However economic theories advocate that market forces or the system of 'free enterprise' **only works in a situation of 'perfect competition'**. **Such perfect competition, when considering the retail industry, simply does not exist anywhere in Australia. Where perfect competition does not exist, then it is desirable, if not necessary for government to regulate to ensure the imbalances are countered.** In retailing, these imbalances exist because of the dominance of the major chains and the availability and size of the retail shopping centres.<sup>34</sup>*

<sup>32</sup> For the casual reader, they should note that particulars of the core **Competition Principles agreement, Code Conduct Agreement, and Implementation Agreement** which relate to the business of the NCC, can be found on page 6 of the Commission's Background Paper, which also explains: *Implementation of the NCP program is split into three 'tranches.' At the end of each tranche – in July of 1997, 1999 and 2001 – the Commonwealth makes 'competition payments' available to the States and Territories if they have made satisfactory progress with the agreed reforms. Overall, these payments are expected to exceed \$16 billion. Assessments are performed by the National Competition Council (NCC) which monitors each jurisdiction's progress and makes recommendations to the Commonwealth Treasurer. All jurisdictions received their first tranche of competition payments."*

<sup>33</sup> *Economics* Australian edition 1991 Messrs Samuelson Hancock and Wallace highlights the point that by definition 'perfect competition implies that no producer or supplier is sufficiently strong or large to influence market forces'.

<sup>34</sup> Page 5 General Overview Hilmer Competition policy Review

54. We have noted that the way the NCC was set up, with minimal consultation with potential and likely stakeholders, has been the subject of public controversy. Mr J Quiggin, in an article published in the *Australian Financial Review* 18 June 1998 entitled *Competition Policy the Chief Culprit*, focuses on the major current criticism that the Hilmer reforms have in effect been imposed from the top down through entities such as the NCC, rather than through Parliament.

55. Mr Quiggin is not alone in his assessment, that such a process was designed to subvert democratic control over public policy. In adding our voice to this concern may we make the very simple but important point that **had greater consultation taken place during the early policy development stages of implementing the National Competition Policy**, then certain industries such as our own (and particularly in our rural and regional areas) **would have hopefully averted some of the unnecessary (and still to be fixed) social, economic suffering and hardship that has and continues to be experienced by our members in rural and country areas.**

56. As the earlier pie charts and tables have revealed in the main body of this submission, the market share currently remaining the province of our members is small and getting smaller. In these circumstances, we would like to think that the members of the existing NCC Council do have at least sufficient business knowledge between them, to appreciate that should there be a complete market failure within the next ten years in the small and independent sector (to the extent that our percentage of the market was to drop below 10%), then by any scale of economic management, we would be unable on any count to compete effectively against the major supermarket chains.

57. The end result therefore of such a complete market failure would be quite the opposite to what the NCC has been charged to secure. Namely, **the consumers**, then left at the complete mercy of the oligopoly (Woolworths, Coles and Franklins) would in all likelihood, by implied collusion, pay more for their consumables at a level **which would bear no relationship to their actual cost price at point of manufacture.** (Refer Appendix 10.<sup>35</sup>)

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<sup>35</sup> Press release from Senator O'Chee entitled "Senator Hits Out At Supermarket Prices"

58. *Appendix 10*. will quite starkly demonstrate to the reader that **the perception the price of goods in the major supermarket chains' stores are always cheaper, is misplaced**. In reality the local independent grocers keep the chain stores *honest* whenever they do have the opportunity to compete on a near level playing field with the major supermarket chain stores. **Should the independent grocers not remain as a competitive force** in the market place, then unquestionably **consumers will be thrown to the lions**, being at the complete mercy of the oligopoly.

59. Australians have been promised for at least a decade that the process of micro-economic reform would yield substantial improvements in living standards. In fact **in our sector of the industry the opposite has occurred**. In the retail grocery industry, **the outcome of open slather trading has been the growing stranglehold of the major grocery chains, forcing many small businesses to get out**. Promoted on the basis of providing convenience, cheaper prices and choice the oligopoly, as a juggernaut, has ploughed on unchecked eroding even further what small portion of the market now remains in the hands of the small and independent grocers. Our allied traders, butchers, pharmacists, bakers, newsagents, florists, liquor stores, and service stations, are now under similar pressure.

60. Primary producers have now also become extremely vulnerable due to the inability of the NCC to, with any measure of commitment, take an interest in any constructive sense in the health and welfare of the small business sector of our economy.

61. A recent example relates to the dairy industry where the major supermarket chains have taken a \$60 million one-off advantage –under the purported aegis of complying with laid down National Competition Policy. End result, Australia's hard-working dairy farmers are paid less for their goods, but there is no change in price for the end product in the supermarket. **Great for consumers wasn't it!** (Refer *Appendix 11* Richard Amery Media Release, and *Appendix 12* Media Release "*Buoyant Woolworths bucks trend & Coles-Woolworths come on down*")

62. These are just some of the observations that could be made. In the next series of subsections we shall dwell further on how the NCC has handled issues such as *attritional weight of income differentials, public interest, public benefit, big not necessarily better, decline in*

*quality of employment, Wholesale Sales Tax, the importance of the maintenance of a no further extension to shop trading policy* and how the NCC's treatment or non-treatment of these determiners, has impacted on the small and independent grocers in rural and regional Australia.

### **Attritional Weight of Income Differentials**

63. As the diagram on the cover seeks to demonstrate, **it is lack of disposable income that has been marching like a swathe across rural and regional Australia, killing off the weaker rural community infrastructures.** This vapourisation of disposable income has been distilled off by a variety of factor pressures, all of which have downgraded the general quality of life environment normally found attractive and desirable to country dwellers. Because of the unchecked market domination of the major supermarket chains over the last two decades, those small and independent grocers which have survived the major chains predatory practices are located in the main in rural and regional areas.

64. Apart from weather-factored issues (such as prolonged drought or a cycle of floods etc), what has been a consistent drain over the last decade in rural and regional areas, apart from the erosion of shopping locally created by the major chains strategically choosing a central country town in which to construct a major retail development and then draw customers in to it from the nearby adjoining towns to the detriment of the local shopkeepers there, has been the ever increasing evacuation back to the urban areas of public service corporations seeking to reduce overhead costs in line with the centrally-based economic rationalist directives of the NCC, such that they now appear to have invaded all aspects of commercial activity.

65. We have seen this attritional impact on rural and regional communities develop in many ways, but overall there has been a relentless predicability as to how many of our country towns are starting to die due to lack of cash flow. This bleeding away has commenced normally with firstly the merging of say several small shire councils, with its attendant reduction in staff, relocation of families, and jobs not filled on retirement or resignation. Then it is the closing of government service depots and line yards, the banks go next and then the service stations, and then in many instances it may be the good old corner/village store proprietor, who is the last to turn off the commercial lights in that town.



66. None of this is justifiable. It is not a matter of moving with the times, simply sheer economic rationalism gone mad. For instance how does one value in economic terms the pleasure felt by an aged person, who has been couped up in a house all day, that no longer her daily ritual to walk to the corner store and have a chat while she collects her mail is to be denied to her. Perhaps the only meaningful social interaction that lady has to look forward to all day, with the use of the telephone to contact a distant relative a less than satisfactory substitute?

67. In short the tragedy of the whole NCC program, as it has badly impacted on rural and regional communities, is that it has been too narrowly sectored, not taking into account the human and community consequences of what are essentially short-sighted fiscal policies, which fail to value the worth of families, jobs, small businesses and community infrastructures. Small business is, was and in reality will always be the backbone of our commercial future and this predatory economic rationalist-driven tramline of the NCC, is a complete social disaster if the big picture as to what is happening to Australia at the present time, is sharply brought into focus.

68. The problems and barriers faced by rural and regional households by these negative impacts of the National Competition policy are sadly very much compounded by the fact that mean average incomes of rural households are a third or more less than their urban counterparts, and with longer distances to travel now, due to the disappearance of basic services, makes their quality of life that much more stressed.

69. While dramatic examples can be highlighted, such as the fact that the average weekly household income in Broken Hill is \$420 per week and that of Sydney \$786, (a 53% differential), across-the-board examples are all significant: Horshan versus Melbourne (65%), Bega versus Sydney (58%), Campbell Town versus Hobart (64%), Kingaroy versus Brisbane (72%) and Goolwa versus Adelaide (63%).

70. When added to the other attritional factors catalysed and made more pronounced by NCC policies, then the ever decreasing level of net disposable income to families must, in many disadvantaged and marginal rural and regional communities, hasten their ultimate demise.

## **VII In Search of Community Benefit**

71. To be fair to the NCC, burdened as it is with an unbalanced Council as presently constituted from the big end of town (who do not really understand the need and fundamental importance of small businesses to the economy of Australia), it does carry a certain leg-iron from which it does need to be freed.

72. Namely, one of the sub-codicils of its charter states (and this is important given the only meagre protection afforded to small business at this time is the cumbersome and legalistic *Trade Practices Act*) that the **Australian Competition Commission**, which is the bureaucratic watchdog responsible for the policing of that act, **is currently restrained in interpreting what constitutes public interest or benefit, and as currently defined with respect to the NCC micro reform program, cannot act in support of community or social values.**

73. Hence it is critical for this Inquiry to give careful consideration to the recommendation contained in the summary section to this submission, **that the following offending clause in the National Competition Policy be immediately deleted, or alternatively expanded dramatically to include a wider value base.** The offending clause reads as follows:

*The Australian Competition Commission -should be directed to give primacy to economic efficiency considerations in determining questions of public benefit*

74. As it currently stands, such a directive essentially hands a blank cheque across to the committed economic rationalist theorists. We submit that such a restrictive definition of what constitutes *public benefit* lies at the core as to why the whole NCC micro-economic reform program has, in our view, *run off the rails*.

75. There is no clearer proof as to how such a narrow interpretation has been effectively exploited by the economic rationalists, than to observe the following Russian-Commissar-style statement made earlier in April this year by Mr Graeme Samuel as chairman of the NCC to the Property Council of Australia. Its overtones are more reminiscent of Stalinist Russia in the 1930s, than democratic Australia in the late 1990's

*Under NCP agreements the onus of proof is on those groups who want to retain legislative restrictions on competition to prove they should be retained. That is, once a legislative restriction is identified, it goes -unless it can be robustly demonstrated that the benefits of the restriction outweigh the costs and that the objective of the restriction cannot be achieved in other ways<sup>36</sup>.*

76. While it is of concern that the Federal Government has chosen to not correct the perceived one-man-band approach of the NCC to micro reform, there are fortunately members of the Senate who have taken on statesmanlike vigour and increasingly the call for *Enough is Enough* is being uttered in that chamber, as is best exemplified by the following outburst by Senator Ron Boswell in May of this year.

*Mr Samuel, I point out to you that the NCC is not a policy maker. You are beyond the reach of the electorate but the electorate expects us, politicians, to point out to you where you are wrong in no uncertain terms.<sup>37</sup>*

77. The tragedy of the above statement made by Mr Graeme Samuel is that he and his Council **appear to be out of touch with the reality of what the consensus view of others in the community are.**

78. Most of us, including the Prime Minister<sup>38</sup>, have a vision for Australia which seeks to preserve adequate quality of life living standards and support services for all Australians, especially in a period of demographic ageing, with the 'baby boomers' of the late 1940s coming ever closer to retirement.

79. In the pursuit of their economic rationalist dogma (and regrettably that is why they have created unquestionably social havoc and dislocation and hardship in the community at large), the current members of the NCC led by Graeme Samuel **have completely left out the human factor** from their planning considerations, and above all those hardest hit have been the great silent engine room of our economy small business, and in particular rural and regional communities.

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<sup>36</sup>Graeme Samuel Presentation to the Property Council of Australia, Adelaide 21 April 1998.

<sup>37</sup>Senator Ron Boswell speech Hansard 13 May 1998 -Senate.

80. In its own quiet way, the *Micro Economic Reform Papers(1997)* made out this point very well in Subject Collection No 9, at page 78:

*Nevertheless an underlying principle common to all micro-economic reform proposals is that the overall well-being of the Australian community and of future generations of Australians can be improved by government-initiated reforms which raise the productivity of the national economy while preserving the fundamental social, cultural and political values.*

### **VIII Those That Survive**

81. Every day, be it in the local newspaper or on television, we hear of struggling regional communities losing facilities (due in the main to the dark cloth of economic rationalist program like an overwhelming fire blanket taking hold): vertical integration arising out of restructures by large corporations; withdrawal of government services, banking or other community services and/or in our unhealthy and anti-competitive retail environment (untouched due to a lack of leadership in this quarter by the NCC), the allurements for struggling rural communities in pursuit of perceived cheaper prices, deserting their own local grocers, and doing their shopping at the next large town; where one of the large supermarket chains, with their deep financial pockets have moved in, and with full support of the local council, built a large new major retail complex.

82. There is great irony being played out in such circumstances, since for many generations, outside of the city centres, it has been the traditional independent trader who has faithfully served in regional areas as the life-raft of community spirit and participation. In small towns all over Australia, they are very often the linchpin leaders for community help and identity.

83. With the stripping away from them by the major supermarket chains of their cash flow and customer base, like the spider in the centre of the web, it is their departure from the local commercial scene, that has caused the collapse of many small and often isolated rural and regional communities they had previously served so faithfully.

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<sup>38</sup>[Insert particulars here of Prime Ministers Press release and Appendix No here]

84. What we believe government planners, who are normally located in head offices based in the large cities of Australia fail to appreciate, **because many have never experienced the richness of it**, is the community spirit and cohesiveness that is generated by the small independent country traders, who have always come into their own in successfully providing such a fundamental *and often unrecognised* support service for the aged in our community; and have done so for years.

85. Not all Australians, and certainly not old people in an ageing population or the disabled, wish to negotiate acres of bitumen, with vehicles travelling in all directions, and enter a very busy, bright-lighted and noisy complex, with bright and gaudy advertising impressing on you what to buy, long queues at checkouts, and served by impersonal young people with whom they are not familiar. *They wish to exercise freedom of choice as to where they wish to shop* and prefer to do so in a more convenient fashion for their purposes; a local store just down the street, which they can walk to in their own time, not catch a bus or ask a friend or relative to drive them there. Further, when they get inside, there is the *social dignity and sense of friendship of being served by someone you know and generally knows* very well their particular wants and needs.

86. These sort of issues, and community outlooks, which are often too easy to take for granted are in essence very important. They relate to the fundamental issue of quality of life and catering for the needs of all spectrums of our community; not simply the mean/average/unit cost criterias with which the economic scientists, who implicitly support the major supermarket chains way of doing business, duly favour.

87. It is now clear as never before that we need at the present time, energetic statesmen in our Federal Parliament. Those who have the stature and mental capacity to raise their heads above the 'cat and dog' of party politics and look at the big picture and strive for all Australians for a quality of life which economic rationalist scientists are quite incapable of delivering. *It is for these reasons that at the very least there should be serious consideration as to whether or not the NCC should be disbanded or alternatively undergo a major overhaul, to ensure social and community values are brought once more into the equation.*

88. If not, it is quite clear that if we continue to follow the economic rationalist path, the faceless large corporations will get larger, which means more profit for their select group of shareholders, the gulf between the rich and poor will become wider, and the already stretched sinews of community cohesiveness may become too taut and snap: crime will flourish with greater intensity, as will incidents of violence, and the qualities of life we have come to expect from Australian society and what it stands for today, will be greatly diminished.

89. It is clear therefore that you who are members of this inquiry have an important role to play. It will be on your respective consciences if you fail the Australian community at large, particularly at this time when those in our rural and regional communities are suffering dreadfully, at the hands of the very narrow-sectored fiscal policies currently being pursued by the NCC.

### **IX Urgent Requirement for Upgrading of Planning Regulations**

90. While in other segments of this submission we have expanded in detail how such an anti-competitive and destructive environment has occurred (*which we maintain has nothing to do with 'progress' but is rather a backward step by Australian planners which is working contrary to the country's best interests*), there are three local government issues that need to be raised here.

- Firstly the need to include in our local planning laws and procedures the requirement for *Socio-Economic Impact Surveys* to become mandatory and brought into force whenever any new significant retail development is applied for by the major supermarket chains in areas which, on the face of it, appear to be already well served by the existing small business retail community<sup>39</sup>.
- Such regulatory initiatives are not new, and we can look to precedents and the experiences gained in the USA, UK, France and elsewhere to guide us on the fine detail as to how such governing devices might best work in practice.

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<sup>39</sup> Refer Appendix 14 which is a copy of NARGA's submission to the Tasmanian Resource Planning & Development Commission in October in respect to its development of a draft model framework for planning schemes. NARGA advances in the submission that the definition of what constitutes 'resources' needs to be more widely based covering socio-economic issues alongside the more traditional cultural, heritage and conservation values..

- It is suggested the public at large would relate well to such surveys being required, given very few citizens would fail to see that such initiatives would be to the public benefit. It occurs already for banking and to combat the media barons. It should in particular negate the out-of-control economic situations that have plagued the southern coast of Queensland over the last few years. There, without any rigorous economic impact statements being prepared, one huge shopping mall after another has been built, which as a consequence has enslaved many small traders to a dwindling unviable cash flow: due on the clear face of it in large part to the inadequate zoning regulations as currently administered by the local planning authorities.<sup>40</sup>
- Secondly, while the first proposal is more in the line of practical commonsense from a planning perspective, given that small businesses remain as the main engine room of our economy in terms of quality job employment, the second proposal is undeniably more radical, but at the same time worthy of consideration by the Inquiry. Namely the consideration for there to be *new pro-active planning/zoning regulations* put in place.
- The issue put here is that
  - (1) even if we do receive endorsement for the speedy introduction of a firm set of rules for the retail sector (which we refer to as the *Pillars of Commerce Principles*), and the complementary anti-trust acts are brought in -framed in a similar way to those currently operating in the US, and
  - (2) by means of divestiture powers contained in this new set of acts, the overall holding of the current major chain oligopoly can be wound back to 75% of the total market share.

91. For those seeking to argue against such a proposition let us say this. The small and independent grocers are *not seeking special protection, simply a fair go to regroup and flourish* in an environment which is currently, due to government inaction (or ignorance) anti-competitive and unhealthy. We believe at the very least the Federal Government (who consistently states that it is the champion of small business and understands its needs), owes it to the small business community of rural and regional Australia for such a feasibility study to proceed, and *without undue delay*.

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<sup>40</sup> This matter was highlighted in the recently released findings (February 1998) on micro businesses in Australia entitled *Under the Microscope* at pp 64, 65.

Their aim would be to specifically limit the major supermarket chains opportunity of intruding any further into regional Australia.

92. *In tandem with such regulations, the development of very strict and comprehensive guidelines for codes of conduct in the retail sector need to be developed after close consultation and input from stakeholders, from both the large corporations and small business sectors.*

93. *We believe such initiatives are completely consistent with Prime Minister John Howard's vision for Australia's future.* Indeed, the major retail chains in our view are working against John Howard's key precepts. There are numerous indicators, for example that the quality of work<sup>41</sup> in the big chain stores is declining in the grocery retail industry, and that 80% of small businesses, as the major employers of labour, are family owned and operated<sup>42</sup>.

### **X Widening Call to Curb the Encroachment of the Major Supermarket Chains**

94. Evidence for the need of a winding back of the market share of the large supermarket chains in order to regain a vibrant small business retail market, not only comes from within the ranks of government, the Industry Commission (which recently merged into the Productivity Commission), but also the ABS's authoritative publication entitled *Small Business Employment (August) 1997* makes the following key points:

- between 83-84 and 94-95 small business has significantly increased its share of national employment
- the share of small business employment in Australia is higher than in large industrialised economies like USA, UK, Germany and France. However it is in line with the share of small business in a number of developed small economies, such as Denmark and Spain.
- in recent years small business has accounted for a disproportionate share of new net jobs in the economy as exemplified by the fact that between 1983-84 to 1993-94 firms with less than 20 employees accounted for 53 (%) per cent of net new jobs added to the Australian economy.
- in direct contrast the employment by small business in retail trade decreased by around 7 (%) percent in both the under 20 and under 100 employee categories. *'This was due to the growing importance of the larger supermarkets and department stores, and the rapidly increasing number of part-time employees in these large enterprises'.*

<sup>41</sup> *Quality of work*: defined in terms of number of working hours, mixture of part-time and full-time employment, proportions of adult and junior employee's.

<sup>42</sup> Research shows that every job gained in a chain supermarket equates to 1.7 jobs lost in a small business. Refer COSBOA.



95. It would appear that the Federal Council of the Liberal Party (Motion 12) on Competition Policy (*Appendix 15*), The Labor Party Platform 1998 (*Appendix 16*) and the ABS Underemployed Media Release dated Sept 1997 (*Appendix 17*) would by implication support in principle the need for government action to address the anti-competitive environment in which the independents are now currently forced, at great disadvantage to trade in general, and particularly in rural and regional areas.

### **XI Importance of No Extensions to Shop Trading Hours**

96. The pace of undertaking reviews has varied from state to state. So far shop trading hours have been deregulated in ACT, VIC, NT, and partially in QLD and NSW. Reviews will take place in WA, SA and TAS in 1998, 1999 and 2002 respectively.

97. While Tasmania has been a notable exception, and much of this due to the effectiveness of the local small and independent grocers cooperative lobby group, Tasmanian Independent Wholesalers (TIW), the majority of the States are being strongly pressured by the 'big end of town' to move towards total deregulation of shop trading hours. Unfortunately, until the development of the *Enough is Enough* public information campaign late this year, which effectively alerted everyone to the critically unhealthy market environment which exists in Australia at the present time, the public interest significance of strongly maintaining a nationwide moratorium on any further extension of shop trading hours, was not widely appreciated by community planners.

98. It is therefore appropriate that we expand Commissioners knowledge in this area, for any extension of existing trading hours does most definitely have an adverse attritional effect on small business, particularly on the edge of rural and regional areas, as was effectively highlighted in the recent Federal Government report on micro businesses entitled *Under the Microscope* at page 70:

*Too often micro businesses suffer cost disadvantages through extended trading hours. Extended trading hours dilute business activity during core hours and reduces turnover, market share and profitability of small business.*

99. This highlights the issue that it is only the politicians and the legislature as a whole, which has the power to wind back the existing oligopoly that has increasingly made the retail grocery sector an anti-competitive market place for the small traditional independent traders.

100. Statistical data available through industry studies and the ABS indicates the following effects of extended trading hours on small businesses:

- Extended trading hours favour the growth of major shopping centres at the expense of smaller sub regional centres and strip shops.
- Employment opportunities are reduced, particularly permanent positions.
- Full-time employment is sacrificed for part-time and/or casual work and overall numbers of employment tend to decline.
- Major national chains gain with increased market share at the expense of locally owned stores, thus affecting transfer of profits, investment and jobs<sup>43</sup>

101. Dr Robert Baker of the University of New England argues that:

*“Trading hour deregulation is causing major inequalities between large and small business, more and less mobile households, and planned and unplanned centres.”<sup>44</sup>.*

Further, in his major survey and paper for the Department of Training and Industrial Relations on this subject, Dr Baker makes the following points which are summarised below:

- The major beneficiaries of extended trading hours are the major retail corporations and marginal (affluent) consumers, and not the general public at large.
- Trading hour de-regulation appears to be more on the agenda of the major retailers, exercising their sovereignty with State Governments, rather than in the interests of consumer sovereignty.
- Extended trading hours accelerates structural change in the retail industry and the ability of major retail corporations to employ fewer staff on a casual basis for equivalent turnover of small business results in a net loss of jobs for small businesses as turnover is transferred from small to large retailers.

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<sup>43</sup> Trading Hours Action Group United We Stand – Submission to the Inquiry into Trading Hours 21 June, 1996.

- Lack of competition evident in the Sydney grocery market has resulted in net higher prices being paid by consumers. Deregulated trading hours has enhanced this.
- Deregulated trading hours in Sydney appears to have reduced the level of competition in the Sydney supermarket sector resulting in the maintenance of higher prices.
- Further evidence indicates milk wholesale prices is dictated by supermarkets in Victoria to enhance their profit margins. Subsequently prices of milk for consumers has risen (see *Appendix 11*).
- Any notions that deregulation automatically results in competition and lower prices must be discounted.
- Sunday trading would create conflict in the shared experience of family. The government should provide a day for stability in family life. The social cost of family break-up and economic and social problems facing children in these situations needs to be considered.
- *16.6% of the Australian population still attend church weekly, which is higher than the 12.0% who have stated a preference of shopping on Sunday every week.*<sup>45</sup>;

102. NARGA would be very appreciative if Commissioners do make these facts well known to government agencies as appropriate. It is clear from the above findings that the net result of extended trading hours, is the transfer of yet more market share to the major supermarket chains. It is for this reason that the large corporations have been most energetic in their lobbying of State Governments to try and have the regulatory dam wall holding back open-slather trading, breached. **For our part we are quite convinced it is in Australia's public interest that there are no further extensions granted to existing shop trading hours, and that a moratorium should be put in place until the soon-to-be invoked Joint Parliamentary Inquiry into the Market Dominance of the retail sector, has been completed and its findings tabled in Parliament.**

## **XII Social Value of Small Businesses to Rural and Regional Australia**

103. Small businesses make a particular and special contribution to the health and development of local and regional communities. The profits generated by small

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<sup>44</sup> Dr R. Baker What Hours Should We Trade Mr Superstore? A Review of the 1994 Australian Experience, Urban Policy and research Vol 13 No2, pp 98, 1995.

<sup>45</sup> R. Baker Queensland Sunday Trading Inquiry Economic and Social Impact Assessment of Sunday Trading Prepared on behalf of the Department of Training and Industrial relations Queensland, 1998.

businesses generally stay in local communities. Operators of small businesses are most likely to have local suppliers, milk, bread and fruit and vegetable vendors and direct delivery services, local employees and to reinvest locally. They also use local services such as accountants and solicitors.

104. A healthy small business sector provides a vehicle for the distribution of wealth in the community. Small business provides opportunities for individuals who may have restricted access to income by providing either employment or a means of earning income. For example, migrant groups have, in the past, established businesses when poor language skills have acted as a barrier to employment of members of that particular group.

105. Furthermore, local small business operators are frequently integrated into local communities through service and charitable organisations (such as Rotary), contribute to local events and are more likely to be involved in the development of local communities.

106. Small businesses provide a diversity of products and types of services. A viable small retail sector provides consumers with greater choice. Traditionally, smaller shops offering a more personalised service have been patronised by the elderly and others needing proximity and convenience.

107. Store closures within this sector, due to harsh economic rationalist policies and its failure to date to effectively act against the major supermarket chains which have made the retail industry Australia-wide unhealthy and anti-competitive, through State and local governments allowing further extensions of shop trading hours or the building of new shopping complexes, are designed to transfer trade from existing local businesses to the major supermarket chains will, therefore disadvantage a large, often less mobile, sector of the community. It is also significant to add at this juncture, that it has been traditionally the small business operator, not the major supermarket chains, that has given dedicated and specialised service to the farming community in rural and regional areas, and has, as part of this service, carried the farmer on credit when seasons on the land have been seasonally adverse: far more directly, flexibly and quickly than any bank or government agency. *Such spirited and community-minded knights of the rural countryside should be encouraged for their consistent support of local industry, not ground into the dirt by economic rationalist reforms from the distant office lights of the NCC.*

108. We conclude therefore that the full implementation in rural and regional areas of the Hilmer Competition Policy Reforms will actually lead to less competition, not more. Hence the overall expenditure to date is that the resultant de-regulation of trading hours simply creates an environment which allows the big to get even bigger.

### **XIII Towards Curbing Market Share of the Major Supermarket Chains**

109. The market share pie charts, as previously exhibited early in the submission, show starkly how the three major retail grocery chains have increased dramatically their market share between 1975 and 1997. Educated predictions, as based on comments made by Woolworths Managing Director Mr Reg Clairs<sup>46</sup>, and other logical assumptions, indicate that market share of the big chains will still continue to increase if not checked by resolute means; such as in pro-active legislation in favour of the public interest and of necessarily supporting Australia's micro business proprietors.

110. The most recent leading American authority on such matters is the voluminous and comprehensive Shils Report, which substantiates the need in certain circumstances for there to be divestiture of assets, should the market dominance of any particular conglomerate in any given market sector become too large, and therefore prone to act contrary to the public interest. The contents subject index page of that report is to be found in *Appendix.18*.

111. Our considered view is that, quite separate from the good intent of officers of the ACCC, it is clear that the *Federal Trade Practices Act*, as it currently stands, does not effectively protect the small trader, from the sophisticated and predatory tactics of the major supermarket chains, given its application, by nature, is essentially negative, and technical in application<sup>47</sup>.

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<sup>46</sup> *The Australian* newspaper 28/8/97 - "Woolworths market share should stabilise at about 37% by then (2000) with main rivals Coles climbing to about 33 per cent". Assumptions relating to the continual increase in market share include the power of the major chains in terms of buying power, market share, advertising potential, efficiencies, technological advancement, and effective use of labour.

<sup>47</sup> The inertia obstacle of being forced in most instances to 'prove' at great expense a breach and also to the detriment of our purposes, the watering down of Section 50 some five years ago, with the doing away of the *dominance* test (under which a test case could have been mounted as to 'cheque book acquisitions' being in fact part of an overt scheme to inhibit, damage, misuse etc) and replacing it with a more ambiguous - in our view - *substantially lessening of competition* test, under which 'creeping acquisitions' as a concept of concern, really does not get a look in. The focus is on the anti-competitive activity, not the anti-competitive outcome.

112. Certainly in the context of the need to conduct legislative reviews in all States, we have no argument with the statements made by the National Competition Policy Review Committee of Inquiry (the Hilmer Committee) when as a matter of policy it was stated:

*“The general desirability of permitting competition is so well established that those who wish to restrict or inhibit competition should bear the burden of demonstrating why that is justified in the public interest.<sup>48</sup>”*

113. However, to uphold the principles of public benefit we believe in the light of the unhealthy and anti-competitive market we presently possess in the retail sector, Australia needs not only the drafting of some *Pillars of Commerce* guidelines, but also appropriate pro-active supportive legislation, which will serve as a fundamental plank in Australia’s fair trading policy. In other words a firm set of laws to ensure not only the public but also small and independent traders from anti-competitive behaviour and thus assure them of a stake in our commercial future. In short the time is now well overdue for politicians and senior bureaucrats alike *to draw a line in the sand as to where they stand!*

#### **XIV Snapshot of Anti-Trust Laws in Use Overseas**

*“Antitrust laws...are the Magna Carta of free enterprise. They are as important to the preservation of economic freedom and our free-enterprise system as the Bill of Rights is to the protection of our fundamental personal freedoms.”*

*The Supreme Court, United States v. Topco Associates, Inc. 1972*

##### **United Kingdom:**

114. The *Enough is Enough* documentation shows that in the United Kingdom the Top 3 grocery retailers control 45% of the market. As recent as 30 July, 1998 John Bridgeman, Director General of the Department of Fair Trading in the United Kingdom, announced that the Office was to look at the profitability of the big supermarkets<sup>49</sup> (refer to *Appendix 2*).

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<sup>48</sup> Independent Committee of Inquiry, National Competition Policy (Hilmer Report) AGPS, Canberra page 18.

*“My inquiry will focus on whether competition between the majors has been distorted to the detriment of consumers. If this has happened, it is likely that the result will be increased profitability of the supermarkets in the area where their market power is concentrated, namely grocery retailing”<sup>50</sup>.*

In the United Kingdom, the *Fair Trading Act* provides two different types of monopoly;

- Where an individual or single company, or companies within the same group, accounts for at least 25% of the supply or acquisition of particular goods or services; and
- When individuals or companies, which together account for at least 25% of the supply or acquisition of particular goods or services, follow a course of conduct, by agreement or otherwise, that prevents distorts or restricts competition.

#### **France:**

115. The *Enough is Enough* documentation shows that in France the top 3 grocery retailers control 38% of the market. In France,<sup>51</sup> the Ordinance of December 1, 1986 covering price-fixing and competition, any commercial “concentration which is liable to restrict competition, in particular by the creation or strengthening of a dominant position” may be subject to review by authorities.

116. One of the quantitative thresholds set out in Article 38 of the Ordinance for determining whether a reviewable concentration exists, is where the organisations in question have collectively made more than 25% of the sales, purchases or other transactions on a national market for substitutable property, products or services or on a substantial part of such market.

#### **United States:**

117. In the United States of America the top 3 grocery retailers control 21% of the market. For over 100 years the United States of America has had laws designed to protect competition in commerce by outlawing restrictive, collusive and anti-competitive practices (refer *Appendix 5*).

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<sup>49</sup> The three largest retailers in the United Kingdom have a collective market share of 45% in the retail grocery market as compared to Australia’s three largest retailers controlling 80%.

<sup>50</sup> John Bridgeman, Director General of Fair Trading comments from Media Release 30 July 1998.

## **XV Justification Behind the Use of Anti-Trust Legislation**

118. It has long been recognised that monopolies are anti-competitive and serve to set commodity prices at artificial levels, often to the unfair advantage of monopoly firms and to the disadvantage of consumers and others. Prices are set at the most advantageous for the monopolist, not what is objectively justified having regard to the true costs of production and the needs of any particular market. In short, prices are not set by the dictates of a truly competitive market. This is equally true in the case of oligopolies, which through their interdependence and market dominance they can control the market to the extent that prices can rise to artificially high levels to satisfy shareholders desires, but at the direct cost to the consumer.

119. With just three major supermarket chains controlling over 80% of our retail grocery market we have one of the most concentrated oligopolies in the world.

120. In the United States, the Courts have had little difficulty in identifying and addressing the anti-competitive effects of oligopolies, and there is no reason why Australia cannot follow suit. It just requires the will of the parliament to instruct the legislation to be drafted, and then have it enacted.

## **XVI American Remedies To Overcome Anti-Competitive Practices**

121. The pro-competition laws in the United States contain a wide range of remedies open to the authorities to help to overcome monopoly power in commerce. The more significant include:

- Criminal proceedings by the Department of Justice
- Proceedings by private citizens which can seek payment of three times the measure of damages suffered by them as a result of any activity prohibited by the antitrust laws
- Civil action by the Federal Trade Commission to remedy anti-competitive conduct.

122. Their most powerful weapon in the armoury of remedies is the order for *divestiture* by which an offending company can be ordered to divest itself of that part of its operations the existence of which results in anti-competitive conduct.

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<sup>51</sup> The three largest retailers in France have a collective market share of 38% in the retail grocery market.



123. A study undertaken by the US Department of Justice dealing with divestiture cases between 1890 and 1974 shows that there is little reluctance on the part of the American authorities to seek divestiture, when that is the most appropriate remedy to anti-competitive practices. Moreover the Shils Report indicates further the willingness of the US authorities to prosecute (*Appendix 18*).

**124. There is no reason to suppose that, given similar powers, Australian courts would not be able to appropriately and properly apply divestiture where that course of action is necessary to restore competitiveness.**

### **XVII Benefits to the Community of Winding Back Market Share**

125. The NCC President Graeme Samuel in his speech to the Property Council of Australia in April 1998 threw down the gauntlet when he said:

*“Under NCP agreements, the onus of proof is on those groups who want to retain legislative restrictions on competition to prove they should be retained. That is, once a legislative restriction is identified, it goes – unless it can be robustly demonstrated that the benefits of the restriction outweigh the costs and that the objective of the restriction cannot be achieved in other ways”.*

126. ABS statistics confirm that by 1985 the mixture between full-time and part-time employment slightly swayed towards full-time employment, and it would appear quality of work for both individuals and families was at its greatest. The benefits to the Australian economy at that time, as a result of this mix, was a vibrant healthy and competitive supermarket and grocery store industry. Small businesses, owned and operated by families thrived and the investment back into the community was maximised. Correspondingly, the employment growth during this period was high, very much spurred on by the level of optimism and zeal generated in the main by small businesses.

127. This submission has highlighted the public costs involved in the implementation of National Competition Policy in the grocer retail market. *We have stressed that the major inadequacy with these policies is the blinkered economic interpretation as to what constitutes ‘public benefit’.*

128. It is of paramount importance for rural and regional Australia, and in particular the small business operators that are the lifeblood of those communities, that a wider more community-based definition which recognises socio-economic benefits required by all Australian including those champions of the bush who reside in rural and regional areas, and framed in such a way that it encompasses the values and provides adequate recognition, so that it clearly supports and encourage Australian small businesses, Australian families, and Australian jobs, and is not loaded unduly towards the 'big end of town', the large corporations.

### **XVIII A Solution: Imposition of a Statutory Limit**

In 1968 a White House Task Force Report on *Antitrust Policy* ("the Neal Report") recommended the introduction of a Concentrated Industries Act under which:

- (1) Anti-competitive effect would be presumed conclusively from proof persistent market share competition (four or fewer companies with a combined market share of at least 70%), and
- (2) In any proceedings under the *Act*, the companies holding such a market share would have the burden of proving that de-concentration would reduce the efficiency of the industry in question.

In view of the present (and growing) share of the Australian retail grocery market held by the top three supermarket chains, and its pervasive impact throughout the length and breadth of Australia, a similar form of legislative base would appear to be a positive solution for restoring a truly competitive environment in Australia's retail marketplace.

### **RECOMMENDATIONS TO INQUIRY**

1. We seek support from the Productivity Commission to assist where possible the case of the small and independent grocers in the forthcoming Joint Parliamentary Inquiry into the Dominance of the Major Supermarket Chains and repeat here our recommendations for action by government as contained in our *Enough is Enough* campaign brochure:
  - To immediately place a cap of 80% on the retail grocery market on the three major chains - which is their current market share.
  - The 80% capping be reduced to 75% within five (5) years with each major chain being allowed to control no more than 25% of the total retail grocery market share.

- To request State, Territory and local governments that it be mandatory for economic and social impact assessment statements to be prepared prior to the consideration of any future applications by the major retail chains for proposed new shopping centres or significant retail developments.
  - To support a moratorium on the extension of shop trading hours in every State/Territory pending the outcome of the Joint Parliamentary Inquiry.
  - In implementing National Competition Policy and considering what is in the public interest, it is important a more balanced impact assessment is made before any further regulatory changes are made and a greater emphasis given to local, social and community impacts.
  - To immediately appoint at least two small/micro-business representatives to the National Competition Council with one acting as co-Chairperson.
  - Support for the appointment of a further small/micro-business representative to the Australian Competition and Consumer Commission and small/micro-business representatives be appointed to other government or semi-government agencies as appropriate as soon as possible.
2. We also make to the Productivity Commission Inquiry, the following additional recommendations. That consideration be given to :
- Either the disbandment of the NCC or if not possible, the replacement of the current chairman. If not possible, the addition in any event of two new members to Council to represent Australian small business interests.
  - A widely-based, grass roots mentoring system is made readily accessible for small business operators throughout Australia.

## SUMMARY

There are five good reasons to justify our recommendations:

- *an increase in jobs*
- *better prospects for small business*
- *more secure and stable rural and regional communities*
- *a boost for family life*
- *a more secure price competition environment for consumers*

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## APPENDICES

1. Terms of Reference
2. Enough is Enough Campaign Documentation
3. Political commitments regarding Joint Parliamentary Inquiry into the Market Dominance of the Major Chains
4. Office of Fair Trading Media Release regarding Inquiry into Supermarket Profits
5. Pro-Competition Policy Law and Policy in the United States
6. JB Were & Son Industrial Research
7. Graeme Samuel Speech to the Property Council of Australia - April 1998
8. Ron Boswell - Hansard 13 May, 1998 referring to Graeme Samuel Speech
9. National Competition Council Chairman & Councillors
10. Media Release - Senator Bill O'Chee "Senator Hits Out at Supermarket Prices"
11. Media Release - Hon. Richard Amery regarding Buying Power of the Major Supermarket Chains in Australia and their Impact on Producers
12. Media Release "Buoyant Woolworths bucks trend & Coles - Woolworths come on down"
13. Media Release relating to the exasperation of the effects of National Competition Policy reforms due to the discrepancy of incomes earned in rural and regional areas and urban centres
14. Submission to the Resource Planning & Development Committee (Tas) on draft model framework for planning schemes
15. Federal Council of the Liberal Party (Motion 12) on Competition Policy
16. The Labor Party Platform 1998
17. ABS Underemployed Media Release September 1997
18. Shils Report USA
19. ABS Statistics indicating Decline in Employment Quality
20. ABS Statistics indicating the majority of employment growth in retail industry is part-time employment
21. TIW Banking Submission

### Recent National Media Clippings Reflecting Key Issues

22. Effect of Major Chain Dominance on Small Business & Support by Small Businesses for Joint Parliamentary Inquiry into the Major Chains and the Market Share Cap
23. Industry Support for Major Chain Dominance Inquiry and Market Share Cap
24. Growth of Major Supermarket Chains
25. Effect of National Competition Policy
26. Effect of Major Chains Dominance on Primary Producers and Prices
27. Social Importance of Small Businesses

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