

Submission

To the
Productivity Commission Inquiry
into

The Impact of Competition Policy Reforms on Rural & Regional Australia



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July 1999

PRESENTATION TO THE PRODUCTIVITY COMMISSION Launceston 5 July 1999

By
**Mr Sam Richardson –General Manager
Tasmanian Independent Wholesalers (TIW)**

OPENING

- Twenty years from now, I believe the ill-conceived activities of the NCC will be fully accepted for what they are; a regrettable social disaster, that has through the application of blinkered and outmoded economic rationalist theories, proved to be catastrophic: quite contrary to their original charter.
- These ravages have in particular, in their many forms (refer diagram attached *Attachment One*), overloaded fragile infrastructures in rural and regional areas, and translated into major job losses alongside the destruction of viable local micro-economies in those communities.
- I will now outline some of the major defects of the NCC, and its attendant policies, as I see them from a retail grocer's perspective, their impact in particular on rural and regional communities, several very worrying inaccuracies and assumptions in your draft report and then provide you with certain solutions/recommendations, which I believe your Commission should consider and support as a matter of priority.

MAJOR SUSPICIONS HAVE YET TO BE ALLAYED

- As previously raised in the NARGA submission, of which TIW is a member, I have yet to see evidence that your Inquiry is not yet another bureaucratic whitewash.
- Indeed your initial findings have not allayed such concerns but instead reinforced them, in terms of your lame acceptance, without close introspective analysis, of certain quite ridiculous propositions as put to you by the major chains, *which we know to be misleading, and cannot be substantiated by fact*¹.
- **If there is one singular set of statements which reveal how inadequately the Commission has failed to research its facts effectively, it is the following to be found on page 231 of your draft report:**

¹ A classic example of such ridiculous propositions accepted by your Commission in its report and essentially lifted straight from the Coles submission are the statements highlighted from your draft report pages 230, 231 (*Attachment Two and Three*) and our rejoinder pp 120,121 as published in NARGA's submission to the Joint Select Committee Inquiry into Retail Dominance (*Attachment Four*), and our full analysis of the selective misleading statements made by Coles to you pp 119-124 *ibid* (*Attachment Five*).

In short there appears to be strong community support for deregulated retail trading hours reflecting benefits to consumers in terms of convenience, range of goods and price. To the extent that consumers value small retailers, they will continue to patronise them and these stores will remain viable.

The researcher who wrote that assessment requires immediate sacking.

- We need go further than to submit to you Submission number 172 from the Australian Consumer's Federation of Australia (*Attachment Six*), as written by Dr Richard Copeman for the concurrent Joint Parliamentary Select Committee inquiry into Retail Chain Dominance.
- The fact is, without the maintenance of critical mass (*I herewith table TIW's submission to that inquiry for your further education*) the independent retailers cannot remain viable and market failure is the ultimate result.
- The reality is that while there might be strong community support for deregulated trading hours among the minority DINKS and DIWKS (according to ABS statistics a distinct minority within our total community mix), who carry most of the nation's disposable wealth in their pockets, the majority of our consumer base, especially the disabled (refer *Attachment Seven* being from Ms Mary Jenkins of the Women's Electoral Lobby of Western Australia), and disadvantaged, aged and infirm do not like traveling in vehicles (many of whom do not possess such items) to large busy acres of bitumen in order to do their shopping.
- These people, the majority of our overall population, much prefer the convenience of location to do their shopping at their local store just down the street from where they live.

FAILURE TO ADHERE TO CHARTER

- The charter of the NCC when it was first set up (and alarmingly as an agency that is not answerable to Parliament), was
...the need for a national competition policy to create and safeguard market structures and behaviour which prevent anti-competitive practices, ensure that markets operate efficiently and to protect the interest of consumers.
- Since its conception, the inappropriateness and in our view irresponsible actions of the Council (in terms of micro-economic reform), has forcefully directed State Governments in a headlong manner, with tight timelines, and with thinly veiled bribes of billions of dollars of taxpayers' money, to commit to certain actions which, in socio-economic terms, we believe have acted contrary to Australia's public interest.

RETAIL GROCERS MAJOR CONCERNS

- Our major concern has been that the NCC's policies and reviews have been implemented without effective socio-economic impact assessments being completed beforehand. As a consequence particularly in the areas of small business and rural and regional communities NCC edicts have served more as portents of a *national disaster*, as against a national advance.

- Refer loss of full-time jobs in preference to part-time jobs and that these have proved to be most substantial in five out of the seven States where both major chain dominance and forced deregulation have been most pronounced. (*Attachments Eight, and Nine*).
- To that extent, we consider the NCC as presently constituted *has failed utterly* to effect that part of the charter they have been given, as to advancing the particular basic needs and aspirations of rural and regional communities; the very communities that have carried Australia for many generations through recession, drought, and flood.
- As a consequence, it has been small businesses, the small independent contractors (and in the field that I have represented for most of my life), the independent retail grocers, who have borne the greatest losses of this most tragic economic-rationalist experiment practiced on the Australian community at large.
- What then are its failings, and how has this occurred to the degree that no less than THREE (3) SEPARATE COMMITTEES OF INQUIRY AT THE PUBLIC'S EXPENSE ARE CURRENTLY REVIEWING THE NCC'S PERFORMANCE?

FAILURE OF NCC TO TAKE ACCOUNT OF CITY/RURAL COMMUNITY INCOME DIFFERENTIALS

- The negative impacts of National Competition Policy on rural and regional areas are compounded by the fact that many households in rural and regional localities on average earn substantially less than their counterparts in their respective capital city.
- In Tasmania, in dollar terms, the average household in Ross earns \$297 per week or a little over half the average household of Hobart on \$563 per week, Campbell Town earns \$361 per week or 64% of the average household in Hobart, St Helens \$360 or 64%, Bicheno \$380 or 68%, and Beauty Point \$389 or 69%. We contend family-based enterprises and small businesses provide the much needed support and infrastructure in rural and regional areas.
- Because of these lower household incomes, people and families in these areas are more vulnerable to harsh economic rationalist policies. Ironically it is this very target group which have suffered most by an ongoing loss of community-based infrastructures in their regions due to closure of banks and the withdrawal of government and other services, as a direct result of NCC economic-rationalisation style thinking.
- In addition, unemployment is higher in these areas, which adds to the cycle of lower incomes and makes townships more vulnerable to the effect of small business closure.

NCC CLEARLY FAILING SMALL BUSINESS

What serves as a double jeopardy is that many of the small businesses in rural and regional areas are family affairs, so that closure or loss of business to the 'big box' major chain developments in neighbouring townships, means loss of employment and income to more than one generation, their spouses and families.

We maintain such realities being allowed to continue unchecked without a comprehensive tightening up of local planning regulations such that major retail development applications made to local councils become subject to socio-economic impact assessments prior to consideration for approval, makes a complete mockery of the stated aim of the National Competition Council which is:

To help raise the living standards of the Australian community by ensuring that conditions for competition prevail throughout the economy that promote growth, innovation and productivity².

Given we can demonstrate in the retailing grocery sector in particular, that with unfettered competition and with no effective regulation at its edges (in terms of capping triggers and divestiture legislation in place along lines similar to that which has been in place in the United States in the form of Anti-Trust Acts), we have experienced an unhealthy concentration of market power into the hands of the major supermarket chains oligopoly.

We maintain this is clearly detrimental to the Australian community as a whole, and thus proves conclusively the performance rating of the NCC to effectively fulfill its charter (with respect to the retail grocery sector component of our economy and the independent grocers who serve in rural and regional areas), is ZERO.

It is clear, despite the wealth of government-resourced research facilities it has available to it, that the NCC *has chosen, deliberately or otherwise, to not take on board the well rounded experiences of the United States*, as the world's foremost free-trading nation, in this fundamental grass-roots area of commerce.

RETAIL GROCERY MARKET IN AUSTRALIA IS NOW THE MOST ANTI-COMPETITIVE IN THE DEVELOPED WORLD.

- Far from seeking to live up to its charter, the NCC is in fact, in many areas, advancing the very trading environment it was created to avoid.
- Today, in the retail sector, the stranglehold of the major supermarket chains is so concentrated, that *Australia holds the invidious distinction of being the most unhealthy and anti-competitive retail grocery market in the world.* (refer *Attachment Ten*). Further, this increasing development of unhealthy and anti-competitive practices, *has been accelerated, not abated under the rule of the NCC.(Attachment 11a and 11b)*
- This raises the key question as to why is it, with the retail grocery market sector on the cusp of market failure, and with the NCC having been put on notice on numerous occasions, that it has, for all intents and purposes stood idly by and done nothing?
- We believe therefore, it is in the public interest, for the Federal government to take its governance responsibilities very seriously, either select a new Chairman that is more attune to small business, and ensure any future reform proposals more adequately cover public interest considerations in their implementation, or at the

² National Competition Council Corporate Plan 1998

very least expand the Council to ensure the independent voice of small business is effectively heard and taken into consideration at the policy formulation stage of the development of NCC policies.

- We believe this requires resolute action by legislative means to effectively amend (as we have submitted earlier this day to the Joint Select Committee Inquiry into Retail Chain Dominance) Part IV of the *Trade Practices Act (1974)*, so that capping, transparency in trading terms provisions and dilution of market dominance, are incorporated into that Act.
- This will ensure that Act is much more industry-specific to the special competitive needs of small business. Otherwise the ongoing public interest of all Australians, as consumers, will continue to remain at great risk.
- That there is a very real need for urgent action has been born out time and time again by earlier government inquiries, and in particular your commission's 1997 Finding a Balance –Towards Fair Trading (Reid Report) ?

There needs to be a recognition the Australian environment is no longer conducive to fair competition because of the high levels of concentration in many industries –including retailing. It is naïve to expect small business to survive unrestrained 'competition' without some form of protection from the worst excesses of the exercise of economic power.

Recommendation 4.1 of that very detailed report refers to 'disturbing evidence' supplied to it in relation to misuse of market power (e.g anti-competitive practices) Recommendation 4.2 of the same inquiry recommended that *the Trade Practices Act be amended to give the Australian Competition and Consumer Commission a wider raft of powers to combat anti-competitive practices, yet very strangely (negligently in our view), the NCC has chosen to take little action in this regard as the charged body responsible to 'create and safeguard market structures and behaviour which prevent anti-competitive practices'.*

We say, that Chairman Mr Graeme Samuels has most regrettably got his priorities eskew. *He should have championed more pro-active action to constructively assist small business in this regard.*

In summation therefore, in respect to the composition of the NCC we believe it has, as a Council, not matched its words with deeds in respect to assisting the myriad of progressive small businesses in Australia.

In a miss-guided manner, we maintain the NCC has forsaken small business for the big-end of town, in strictly applying without exception a blinkered economic-rationalist approach to the full spectrum of commercial activities in this great country.

There is no doubt the principal victims of such a broad-brush approach, has been small business, and particularly those residing in rural and regional Australia.

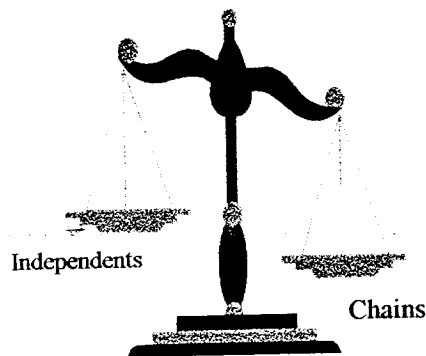
RECOMMENDATIONS

The following Recommendations are to be considered in order of priority.

-
- That Mr Graeme Samuels step down as Chairman and a new Chairman be appointed who, as part of their credentials, can demonstrate a great depth of small business experience.
- If not, that additional members be appointed to the Council that possess grass roots small business experience.
- Socio-economic impact assessments become mandatory pre-conditions in local government planning application procedures for the consideration of major chain supermarket retail development applications.
- That the Commission support in principle the instructing of the ACCC to consider and report back to the Joint Select Committee inquiry, the final wording for the three proposed preliminary draft amendments to Part IV of the Trade Practices Act, as prepared in preliminary draft form (refer *Attachment Twelve*) as they relate to capping, transparency of trading terms, and dilution of market dominance (divestiture).

Sam Richardson
General Manager
TIW
Launceston 5 July 1999

Pillars of Retail Equity



Striking A Balance

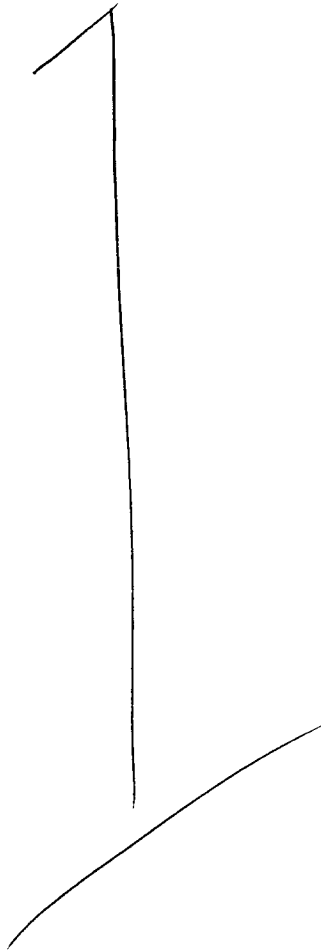
The Key Action Points

1. The capping at 80% of the retail grocery market of the three major supermarket chains.
2. This 80% capping being reduced to 75% within five years with each major chain being allowed to control no more than 25% of the total retail grocery market.
3. Anti-trust legislation, including stiff penalties for abuse of market power, divestiture powers and criminal sanctions.
4. Mandatory economic and social impact statements for all proposed new shopping centres or significant retail developments.
5. A moratorium on the implementation of National Competition Policy in the retail sector.
6. The immediate establishment of a new national watchdog to monitor the retail grocery market share of the retail chains and report publicly every six months and to maintain an ongoing monitoring role of retail grocery prices and predatory or anti-competitive trade practices, misuse of market power or other action.
7. Requirement to disclose to the ACCC manufacturer's trading terms and conditions on a confidential basis to ensure transparent and fair pricing policies and such a review to be undertaken every six months.
8. The appointment of small/micro-business representatives to all Government, semi-Government and statutory authorities.

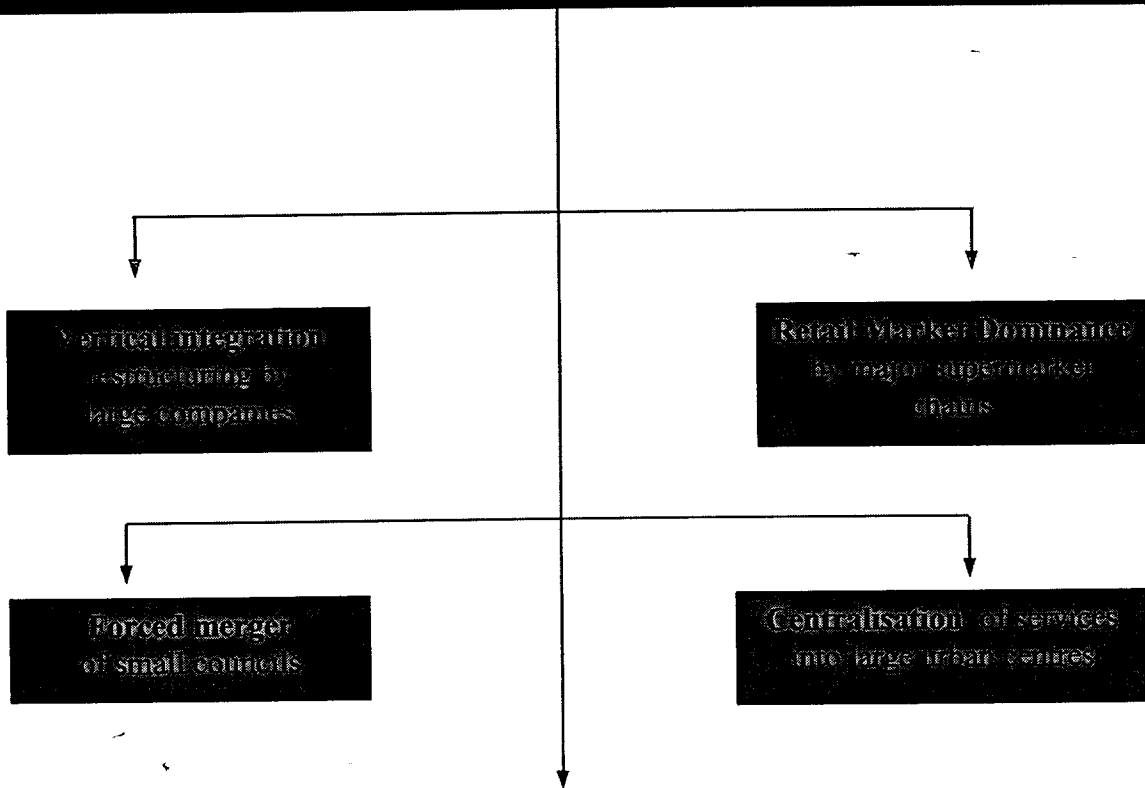
Justification for this Regulatory Policy

There needs to be a recognition the Australian environment is no longer conducive to fair competition because of the high levels of concentration in many industries -including retailing. It is naive to expect small business to survive unrestrained "competition" without some form of protection from the worst excesses of the exercise of economic power.

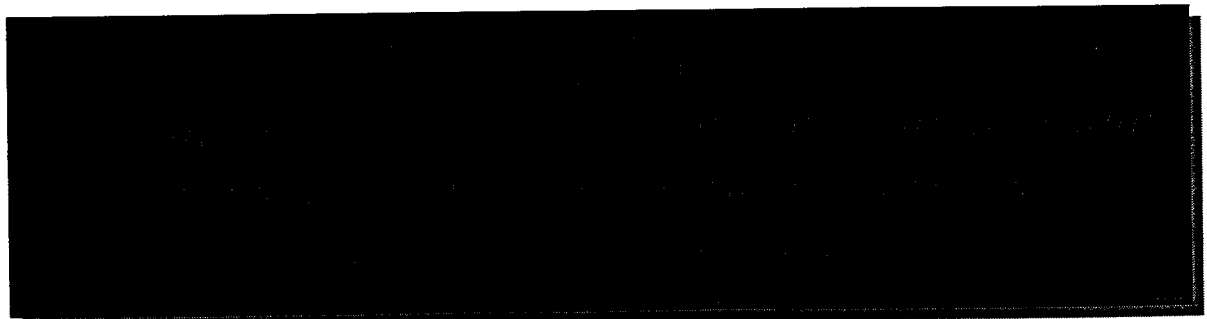
Finding a Balance - Towards Fair Trading (Reid Report, 1997)



Impact of Competition Policy Reforms On Rural & Regional Australia



**DRAMATIC
STRIPPING AWAY OF
DISPOSABLE INCOME
IN RURAL AND REGIONAL
AREAS**



2

Effects of deregulation

The available evidence suggests that, overall, retail employment has not declined and has actually increased in jurisdictions where trading hours have been deregulated.

After shopping hours were deregulated in Victoria in November 1996, Coles Supermarkets employed an additional 2000 staff in Victoria over the following twelve months to meet the additional demands from longer trading hours (Coles Supermarkets, sub. 97). Woolworths (sub. 213) also said it had employed an additional 2000 staff since the deregulation of trading hours.

Such gains need to be considered in the context of employment losses by small retailers. The NARGA claim, that for every job gained in a major retailer 1.7 jobs are lost in the small retail sector, would imply a loss of retailing employment of 6800 in Victoria as a result of the additional staff (4000) employed by Coles and Woolworths supermarkets following deregulation. However, the Retail Traders Association of Victoria, using ABS Labour Force data, said that employment in the retail sector in Victoria had *increased* by 5500 (from 314 500 to 320 000) between February 1997 and February 1998. This period covers a significant part of the twelve months following deregulation (Coles Supermarkets, sub. 97).

There have been some changes in the use of part-time and casual labour by retailers in recent years. For example, the number of Woolworths' part-time employees increased strongly between 1993 and 1998, although there was also a significant increase in the number of full-time employees. However, there was also a trend to increase the number of staff employed on a permanent basis. For example, the proportion of total hours worked by Woolworths' casual employees in Victoria declined from 50 per cent in 1993 to a current figure of 18 per cent and, in New South Wales, from around 50 to 30 per cent over the same period (Woolworths, sub. 213).

Coles Supermarkets also identified a shift away from casual labour:

Over the past four years Coles has moved away from the traditionally heavy casual component of our supermarket workforce, and increased our reliance on full time and permanent part time employees.

The various enterprise agreements reached over this period with the Shop Distributive and Allied Employees Association (SDA) allowed Coles to improve its customer service whilst improving permanency, job security and career opportunities for employees. (sub. 97, p. 10)

From a consumer perspective, it appears that deregulation has given rise to considerable benefits. The removal of regulations on retail trading hours has

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increased consumer choice and removed the costs imposed on consumers by limiting where and when they can shop. Some evidence of consumer preferences for deregulation is provided by a recent referendum in 1998 in the Victorian city of Bendigo following some local opposition to the introduction of Sunday trading. Of the 72 per cent of eligible voters who took part in the referendum, conducted by the Electoral Commission at the request of the Victorian Government, 77 per cent voted to maintain Sunday trading (Coles Supermarkets, sub. 97).

Consumer access to the shop of their choice is restricted by the regulations on trading hours. Coles Supermarkets said:

Shop trading hours which vary from state to state, effectively restrict consumers' choice of and access to retail goods. They discriminate between retailers on the basis of their size or because they sell or do not sell a particular range of regulated goods. They also discriminate between the retail sectors and other sectors, all vying for the consumers dollar. (sub. 97, p. 3)

A Victorian Government Department of Treasury and Finance analysis forecast that the deregulation of trading hours would generate net benefits to consumers of around \$65 per person per year and boost demand for retail goods by 0.6 per cent (Victorian Government 1998).

While some participants in country Australia have pointed to costs associated with deregulation, restrictions on trading hours also impose costs on residents in remote areas of country Australia. The Shire of Yalgoo said:

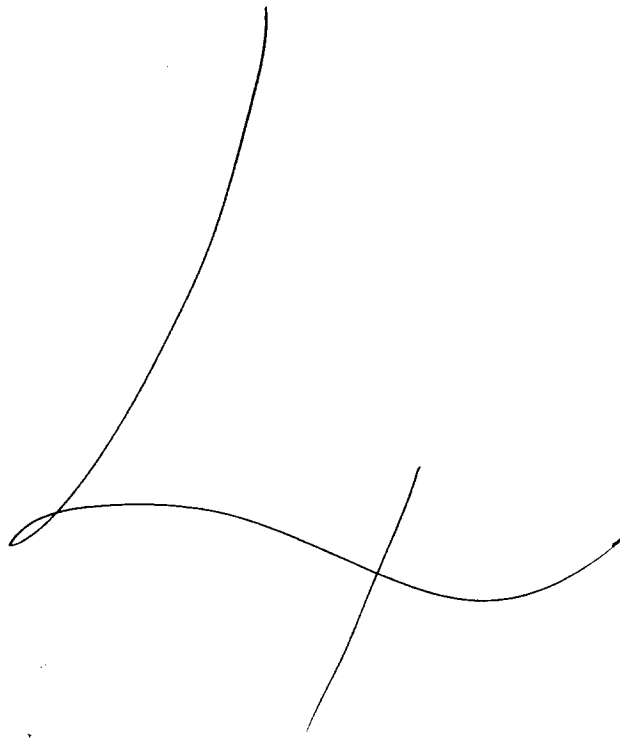
Many small communities in the WA hinterland are at a considerable distance from the nearest city. The restricted trading hours imposed in WA work to the disadvantage for people from remote communities because, on their occasional excursions to the city, it limits the amount of business they can achieve in a day. This often necessitates an overnight stay and adds to the cost of doing business. (sub. 98, p. 6)

Small communities in WA
hinterland
restrictions on trading hours
impose costs on residents in remote areas

In short, there appears to be strong community support for deregulated retail trading hours reflecting benefits to consumers in terms of convenience, range of goods and price. To the extent that consumers value smaller retailers, they will continue to patronise them and these stores will remain viable.

FINDING 9.1

Changing social patterns, such as more flexible working hours, the increase of women in the workforce and single parent households, have resulted in decisions by governments to make shopping hours more flexible. More liberal retail trading hours have weakened the competitiveness of some retailers. At the same time, they have been of benefit to consumers and appear to have increased employment opportunities, including in country Australia.



products and the complications of comparing prices nationwide and abroad. Answer him one thing: how come the price of pigs he sells to market has plummeted over the past year, but the price of pork cutlets has hardly fallen at all.

Sunday Times, 27 September 1998

Use of Employment Statistics Generally

The submission chooses to use its new store at Langwarrin, in Victoria, as a public relations showcase as to how future employment profiles within Coles Supermarkets will be structured, as we move into the next millennium, e.g. that 75.5% of the total hours worked would be by full-time, 23.5 % part-time and casual staff a mere 1%.

We suggest this is essentially 'kite flying' for, as the ABS statistics reveal in Victoria in the retail grocers and supermarkets section, full-time employment between 1985 and 1998 has only increased marginally (from 23,200 in 1985 to 23,300 in 1998), a 0.4 % increase, while over the same period part-time employment has increased from 15,100 to 38,100, representing a 152.3% increase.

Very Selective Use of Employment Statistics

Another issue worthy of note is the suggested rosy post de-regulation employment experience enjoyed in Victoria, of there being 11,200 more retail jobs created and that Coles was responsible for 2,000 of these.

To paint such a positive picture they use employment figures between February 1996 (303,300) and February 1997 (314,500). Yet, if they had chosen August figures a totally different picture emerges. In that month, August 1997, the official figure is 300,500, in effect some 14,000 below the February 1996 figure, and therefore there had been a net decrease in

employment in the retail sector over that extended period February 1996 to August 1997!⁸⁰

Due to the high concentration stranglehold of the major supermarket chains prevailing in the retail grocery sector, and without adequate government regulation in place, ABS statistics confirm that permanent part-time and casual staff made up a significant 72% of the workforce in 1998, a mere 5% drop from 1994.

Hence, the utopian picture as presented by Coles using Langwarrin as its 'model' store for the future (with casual staff hours being a mere 1% of the wages bill) is, we suggest, a deliberately planted mirage in a desert that is common practice reality.

Keeping the Supermarket Chains Honest

The sad fact is, without appropriate anti-trust legislation, the stranglehold now operating in the retail grocery sector is so vice-like that not only is the market too concentrated and thereby anti-competitive, but survey after survey in recent times has shown that in terms of price, it is only where there are independent or other stores nearby, will the major chains be forced to keep their prices for consumers at a competitive level. The Coles submission is of course ominously silent on such primary issues.

Not the Employment Generators as Inferred

Comprehensive research has shown that for every job created by the major supermarket chains, as part of their relentless incursion into the independent grocers market share, 1.7 jobs are lost to small business, and more

⁸⁰ It simply makes the key that readers of economic papers on employment need to be extremely cautious as to the themes presented from time to time by the 'economic-rationalist scientists'. ABS retail employment figures show major fluctuations. For example for August 1998 the figure is 307,300, yet in August 1994 it was 308,600, hence showing yet again a net decrease, much of it caused we maintain by the encroachment of the major chains on the independent grocers market share and the associated 1:1.7 job loss loading which subsequently occurs.

5

(b) Comments on Coles Submission to the Productivity Commission on Impact of National Competitions Policy on Rural and Regional Australia

General Comment

The submission carries the normal standard arguments presented by the major supermarket chains, and focuses on employment, retail growth and community support.

One key issue they seek to impress with, is that a basket of goods has never been cheaper and that somehow Committee members on reading this, should interpret such a fact to mean that we have a very competitive retail market.

This is misleading. Quite separate from the major concerns of the independent grocers, newsagents, pharmacists, and a host of other small business operators in the retail sector, ask any farmer.

One of the reasons as to why the income differential between rural and regional areas has been so bad in recent years, has been the emerging market dominance of the major supermarket chains. Because of their virtual oligopoly in purchasing power, and based on all the advice we have the major supermarket chains have literally screwed the primary producer, and indeed other suppliers and manufacturers, in terms of purchase price, through the floor. In general, it appears the producer has lost out, be it apples, meat, milk or bread or fresh vegetables. In this regard, we are aware of certain submissions to be made to the Committee in camera – to ensure a secret hearing and witness protection.

The following experience from a UK farmer dramatically speaks also for the Australian farmer on this point:

For Fred Henley the question of whether supermarkets are overcharging their customers is simple. Forget the thousands of lines of different

products and the complications of comparing prices nationwide and abroad. Answer him one thing: how come the price of pigs he sells to market has plummeted over the past year, but the price of pork cutlets has hardly fallen at all.

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Keeping the Supermarket Chains Honest

The sad fact is, without appropriate anti-trust legislation, the stranglehold now operating in the retail grocery sector is so vice-like that not only is the market too concentrated and thereby anti-competitive, but survey after survey in recent times has shown that in terms of price, it is only where there are independent or other stores nearby, will the major chains be forced to keep their prices for consumers at a competitive level. The Coles submission is of course ominously silent on such primary issues.

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importantly they are quality permanent-style jobs generally of a more senior demographic age group than those employed by the major chains.

Therefore, further down the chain as jobs are lost to small business due to the anti-competitive environment which currently exists (and is fostered further by the implementation of the current unchallenged economic-rationalist NCC policies), the redundancies of this older age group out of our retail workforce create an even greater headache in terms of re-training for community support organisations.

The facts are that the small independent grocers are job rich employing one person for every \$55,000 of turnover, while the major chains are job-poor only employing only 0.6 a person for the same amount of sales revenue.

Not Customer Choice –Pressuring for Prime Sites and Deep Pocket Retail Developments

Contrary to the impression developed in the Coles' submission to the Productivity Commission, it has not been any new revolutionary approach to serving the customer that has accounted for the success of the large supermarket chains in recent years, but rather an uneven and anti-competitive playing field.

The two major supermarket chains (Coles and Woolworths), with their deep financial pockets, have consistently and with great effect in many dormitory suburbs throughout the length and breadth of Australia, pressured local councils (without the need for socio-economic impact statements being as yet a mandatory part of their planning regulations) to secure access to the best sites available, and through such a process marginalised the existing small businesses in that area.

It has been the initiative of the major supermarket chains (not customers), in seeking to 'go for the jugular', under the guise of providing ostensibly 'customer convenience', that has spawned the building of major palatial retail

developments, that has prompted some segments of our community base to 'vote with their feet' away from their local corner or 'down the street store' to the planned palatial one-stop shop supermarket emporiums.

The initiative really for such deep pocket developments, as planned by the major supermarket chains, and of course this is glossed over in the Coles submission by the use of statements such as

In 1972 it took consumers 267 minutes to purchase a basket of 15 goods, and today for the equivalent basket it only takes 199 minutes

Is not so much one of customer convenience, but rather their naked lunge for an ever increased cornering of available market share.

What the Coles submission does not make clear, is that they are really projecting their shopping culture to cater principally for the cash-rich segments of our society, the time-poor DINKS and DIWKS, who with both parents working (and have the cash to spare) are content to be milked of disposable income in such shopping practices.

The submission fails to raise the fact that the remaining 62% of our community are not of that sector,⁸¹ the old, frail, disabled, disadvantaged, and single parent sector, who are not time poor and are quite happy to shop in the traditional manner.

All the majority of consumers want, and particularly in an ageing population, is a truly competitive environment, which can only arise if the 'playing field' is relatively flat, so that, apart from other reasons, what prices they pay are the best available.

Unfortunately without government regulation and the current major chain stranglehold in place, this is not occurring, and hence the foundation stone as to why this particular Joint Parliamentary Inquiry is so critical for the current and future welfare of the disadvantaged in our community.

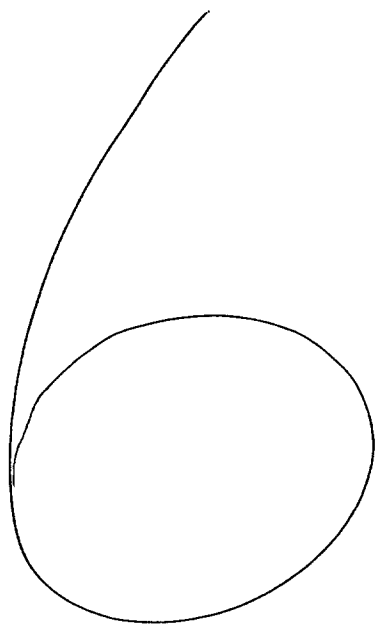
Accordingly, we consider one of the major weaknesses in the Coles submission to the Productivity Commission Inquiry, is that it does not adequately address the fact that small businesses provide a real and human service to this majority sector in our consumer community in a manner and form which the major supermarket chains are unable to match.

Conclusion

There is fancy footwork in the Coles submission to the Productivity Commission Inquiry into the NCP and its impact on rural and regional Australia in terms of stats and assertions. We maintain the Coles submission skirts the principle issues at stake here.

Namely, our retail grocery sector is dangerously concentrated, anti-competitive, and anti-small business which is the major job generator in our community. Thus in the long-term the aggressive and uncontrolled expansion of the major supermarket chains are essentially a self destructive cancer within the community as we know it today, being anti-family, anti-individuals, anti-local cash-flow and *in toto* acting contrary to Australian long-term interests as an independent Nation State.

⁸¹ Refer ABS 1996 Census of Population and Housing, X33 Family type and Labour Force Status.



Consumer Food Network of the Consumers' Federation of Australia

SUBMISSION TO THE JOINT SELECT COMMITTEE ON THE RETAIL SECTOR

The Consumers' Food Network of the Consumers' Federation of Australia opposes the increasing domination of retailing in Australia by a small number of large retail chains.

The negative effects of this domination are:-

§ Lack of competition e.g. on genetically engineered foods, all major chains have had the same policies, coordinated through the Supermarket Institute and the Food and Grocery Council.

§ Increased consumer prices e.g. for fresh fruit and vegetables, which are more expensive in supermarkets than in specialty greengrocers.

§ Decreased consumer choice e.g. when a supermarket carries basic delicatessen lines and puts the local specialty delicatessen out of business, more specialised delicatessen items are no longer available in the local area.

§ Closure of small shops in local neighbourhoods and rural and regional areas e.g. corner stores, bakeries, greengrocers etc

§ Increased distance to travel to do basic shopping

§ Greater dependency on car travel for shopping

§ Less accessibility to shops for the elderly and the poor who do not have access to a car

§ Decline of local communities e.g. once the smaller shops go, the banks follow, then the garages, and other businesses.

§ Alienation of prime land for new shopping centres

§ Loss of jobs in small business

We support:

§ No approval for new large shopping centres in areas with adequate retail space

§ A commission of enquiry into allegations of corruption in the obtaining of land rezoning approvals for major developments from local government

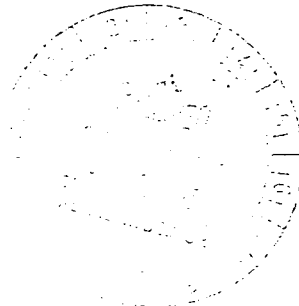
§ Limit of 25% market share for any one retail chain

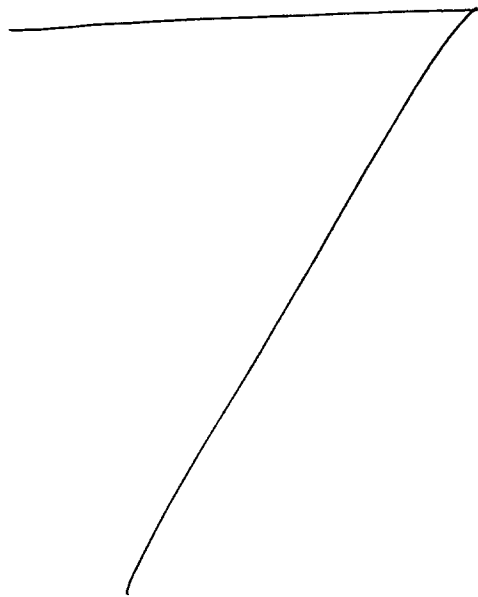
§ Limit of 60% total market share for the three major chains

§ Provision of support for local shopping centres to remain viable

§ Re-focusing of the application of National Competition Policy and the functions of the ACCC to ensure that competition principles are applied where there is most to be gained for society as a whole. Market dominance needs to be broken up in sectors where competition is beneficial, such as in retailing, but essential utilities such as electricity and water, which are natural monopolies, should remain as such in government hands.

Dick Copeman
Consumer Food Network
223 Logan Road, Buranda QLD 4102
Australia
Ph (+61) 07 3217 3187
Fx (+61) 07 3217 3028





FROM: MJENKINS@CARMEN.MURDOCH.EDU.AU
X-SENDER: MJENKINS@CARMEN.MURDOCH.EDU.AU (UNVERIFIED)
X-MAILER: QUALCOMM WINDOWS EUDORA LIGHT VERSION 3.0.6 (32)
DATE: FRI, 02 JUL 1999 02:15:14 +0800
TO: NARGA@TASSIE.NET.AU
SUBJECT: CA MAJOR CHAIN DOMINANCE

SORRY I AM TOO LATE TO SEND IN A SUBMISSION BUT IF THEY ARE STILL ACCEPTABLE I WILL DO SO.

I AM CONVENOR OF WOMEN'S ELECTORAL LOBBY IN WA AND WE WISH TO SUPPORT YOUR CAMPAIGN.
IT IS ESSENTIAL FOR SMALL BUSINESSES TO BE PROTECTED FROM THESE LARGE FOOD CONGLOMERATES.
THESE DICTATE WHAT FOOD IS AVAILABLE AND TRY AND INFLUENCE WHAT WE BUY BY KEEPING CERTAIN PRODUCTS OFF THE SHELVES WHILE THEY GET RID OF THEIR BULK PURCHASES OR BRAND NAMES, OR OLD STOCK. WHEN GOVERNMENT TALKS OF CHOICE AND COMPETITION THEY ARE ACTUALLY REMOVING CHOICE BY LIMITING THE SMALLER PROVIDERS FROM PARTICIPATING.

ON LONGER HOURS
WEL WOMEN DISCUSSED THIS AND WE ARE TOTALLY AGAINST ANY FURTHER EXTENSION TO SHOPPING HOURS IN WA. THIS WILL ONLY ADVANTAGE THE LARGE SUPERMARKETS WHO CAN AFFORD TO PAY STAFF AND WORK AT A LOSS UNTIL IT EVENS OUT.
LONG HOURS NOT ONLY WILL INCREASE COSTS TO THE CONSUMER BUT WILL GIVE THESE LARGER STORES THE MEANS TO CONTROL ALL FOOD PRICES AND NAME THEIR PRICE WITHOUR FEAR OF COMPETITION IN THE FUTURE.

HERE IS MY EXPERIENCE FROM A PERSPECTIVE OF A PERSON IN A WHEELCHAIR.
I SPEND SOME MONTHS IN A WHEELCHAIR IN 1989. IT WAS THEN I DISCOVERED THE INCONVENIENCE OF SHOPPING IN THE LARGE STORES LIKE COLES AND WOOLWORTH (MY LOCAL SHOPPING CENTRE)

THE DIFFICULTY BEGAN LONG BEFORE I GOT INTO THESE SHOPS. IT BEGAN IN THE CARPARK. IT IS ALMOST IMPOSSIBLE TO PARK AND IT IS A LONG WAY FROM THE SHOPS, ALSO ON A SLOPE. WHEN I LATER WENT ONTO CRUTCHES IT WAS EVEN WORSE TO SHOP IN ANY OF THESE LARGE CENTRES.

I FOUND A LOCAL SHOP IN A SMALL COMPLEX THEN, WHICH I STILL USE TODAY. I CAN PARK ALMOST OUTSIDE THE DOOR. A SHORT PUSH IN THE CHAIR OR LATER WALK INTO THE SHOP, MADE IT MUCH EASIER, ESPECIALLY WHEN THE CAR PARK WAS LEVEL.

WHEN INSIDE THIS SMALL SHOP I FOUND EVERYTHING I NEEDED WITHOUT ALL THOSE LONG LINES AND MILES OF STOCK WITH DISPLAYS IN THE WAY, AS THEY OFTEN ARE IN THE LARGE SUPERMARKETS.

AS FOR THE CASH OUT, THERE IS NEVER A WAIT IN MY SMALL LOCAL SUPERMARKET. THE CUSTOMER COMES FIRST, IF TWO PEOPLE ARE WAITING THEY OPEN ANOTHER ONE AND CLEAR THE CUSTOMERS QUICKLY. I KNOW ALL THEIR NAMES AND THEY ARE REAL FRIENDLY. NOT LIKE COLES WHERE THERE ARE ALWAYS VACANT CASH OUTS WITH NO STAFF ON BUSY TIMES LIKE AT THE END OF THE DAY.
I HAVE WALKED OUT OF WOOLWORTH BECAUSE OF THIS AND RARELY SHOP THERE ANYMORE. THERE IS TOO MUCH CLUTTER IN THE ISLES AND UYOU HAVE TO WALK TOO FAR TO GET ANYTHING. IT TAKES TWICE AS LONG TO FIND A FEW ITEMS, THEN IT IS A LONG WAIT AT THE CASH DESKS.

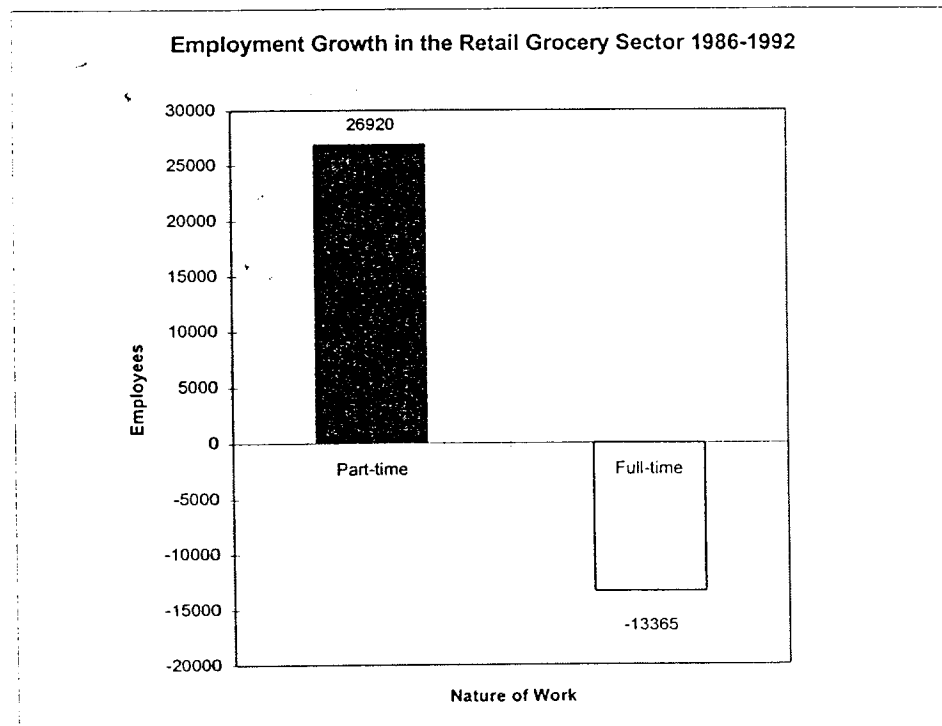
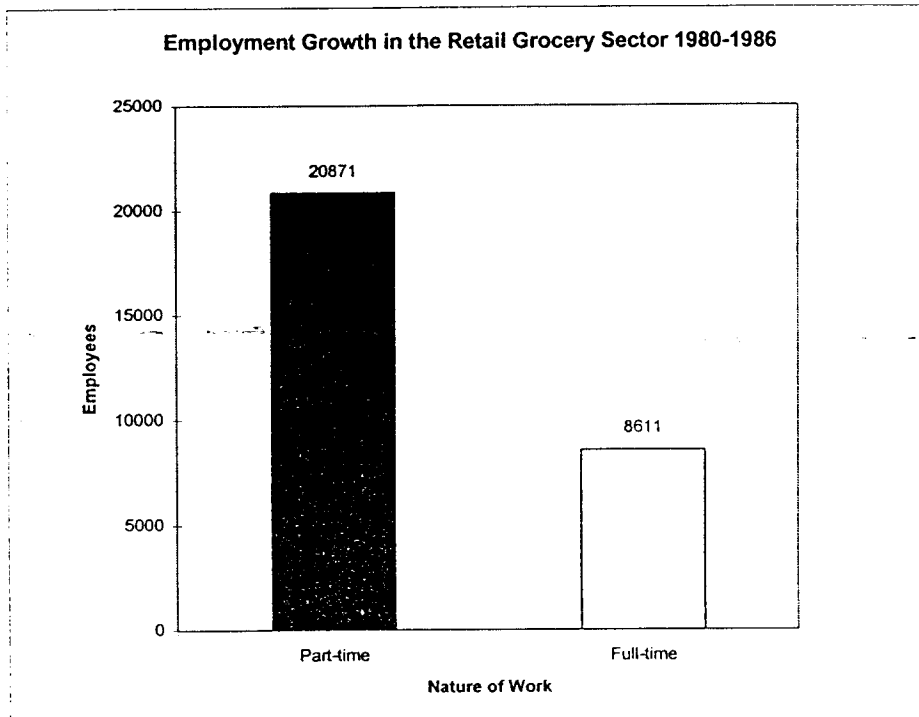
MARY JENKINS
WOMEN'S ELECTORAL LOBBY WA
1 ROSS COURT
SPEARWOOD 6163 WA.

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Emerging Dominance of Major Chain Supermarkets has meant a Diminution in quality of employment



Source: ABS Retail Census 1980/1988/1992

Recent work by Dr. Robert Baker has revealed that the rate of casualisation of the workforce away from full-time to part-time by the major chains is double that of the independent grocery retailers. Not only does this impact on individuals and families, but should also be of concern to the Australian Taxation Office.

EMPLOYMENT IN THE SUPERMARKET AND GROCERY STORES SECTOR WITHIN AUSTRALIA

FULL TIME

PART TIME

TOTAL EMPLOYMENT

STATE	(000's) 1985	(000's) 1998	% + or -	(000's) 1985	(000's) 1998	% + or -	(000's) 1985	(000's) 1998	% + or -
NSW									
City	18.7	17.1	-8.6	10.2	23.1	126.5	28.9	40.2	39.1
Balance of State	11.0	12.0	9.1	7.0	17.6	151.4	18.0	29.6	64.4
NSW TOTAL	29.7	29.0	-2.4	17.3	40.7	135.3	47.0	69.7	48.3
VIC									
City	17.5	14.7	-16.0	11.1	25.6	130.6	28.6	40.3	40.9
Balance of State	6.7	7.5	11.9	3.9	11.3	189.7	10.6	18.8	77.4
VIC TOTAL	24.2	22.2	-8.3	15.0	37.0	146.7	39.2	59.2	51.0
Queensland									
City	6.2	6.4	3.2	5.6	26.9	380.4	11.8	33.3	182.2
Balance of State	8.2	10.1	23.2	4.9	15.2	210.2	13.1	25.3	93.1
QLD TOTAL	14.5	16.5	13.8	10.5	26.9	156.2	25.0	43.4	73.6
TAS									
City	1.1	1.0	-9.1	0.5	0.9	80.0	1.6	1.9	18.8
Balance of State	1.6	2.7	68.8	0.8	1.6	100	2.4	4.3	79.2
TAS TOTAL	2.7	3.7	37.0	1.2	2.5	108.30	3.9	6.2	74.4
SOUTH AUST									
City	5.2	3.3	-36.5	4.5	7.8	73.3	9.7	11.1	14.4
Balance of State	2.2	1.9	-13.6	1.0	2.6	160.0	3.2	4.5	40.6
S A TOTAL	7.4	5.2	-29.7	5.5	10.4	89.1	12.9	15.6	20.9
W A									
City	5.9	6.4	8.5	5.5	10.4	89.1	11.4	16.8	47.4
Balance of State	2.7	3.2	18.5	1.5	3.7	146.7	4.2	6.9	64.3
W A TOTAL	8.6	9.5	10.5	7.1	14.1	98.9	15.7	23.6	56.3
Australian Cities									
City	54.6	47.6	-12.8	37.3	78.8	111.3	91.9	126.4	37.5
Balance of States	34.0	41.9	23.2	20.9	56.2	168.9	54.9	98.1	78.7
AUSTRALIA TOTAL	88.6	89.5	1.0	58.2	134.9	131.8	146.8	224.5	52.8

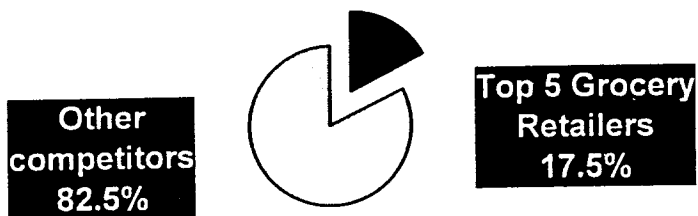
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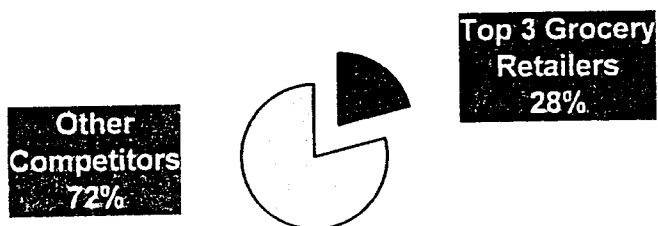
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International OECD Comparison

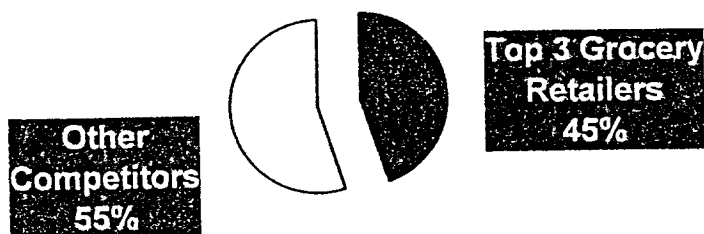
Japan 1998



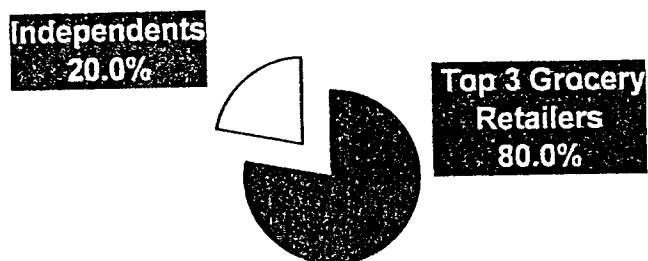
United States 1998



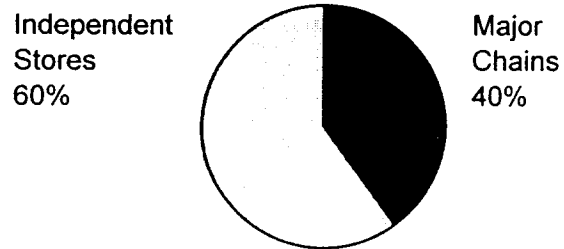
United Kingdom 1998



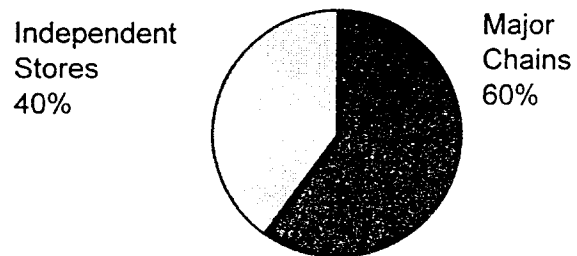
Australia 1998



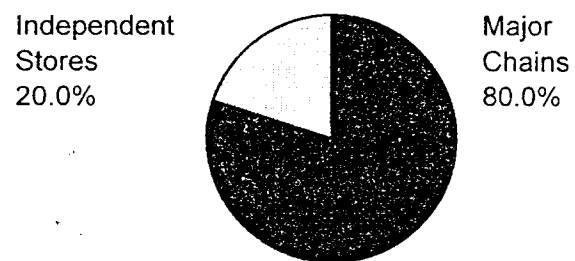
Australia's Retail Grocery Sales



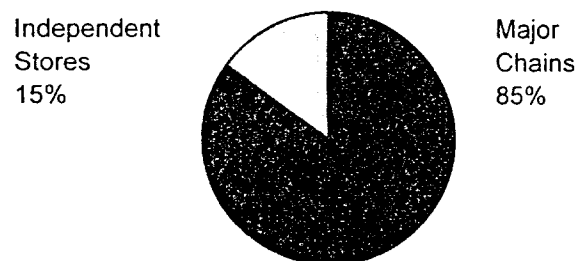
1975



1985



1998



2000

MARKET SHARE BY STATE/TERRITORY

CHAIN GROCERY RETAIL MARKET SHARES DECEMBER 1998

	WOOLWORTHS	COLES BI-LO	WOOLWORTHS/ COLES TOTAL	FRANKLINS	TOTAL
NSW	36.4	24.1	60.5	24.0	84.5
VIC	35.6	33.4	69.0	8.4	77.4
QLD	38.0	32.1	70.1	16.0	86.1
SA	30.0	38.6	68.6	6.8	75.4
WA	27.1	34.1	61.2	N/A	61.2
TAS	48.5 (e)	29.2	77.7	N/A	77.7
NATIONAL	35.5	30.6	66.1	13.9	80.0

Source AC Nielsen & *Retail World*

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Attachment TWELVE
Supplementary Submission TIW
Joint Parliamentary Committee Inquiry –Retail Chain Dominance

PROPOSED AMENDMENTS TO
TRADE PRACTICES ACT(1974) -Part IV

1. What is proposed here is a composite approach, three separate amendments which, working in tandem, should produce material advances to make the retail grocery market more competitive and of greater public benefit to the consumer in terms of price, convenience and location.
2. For the purposes of ease of understanding of their application each preliminary draft is first stated, then its benefits explained below.

PROPOSAL ONE – Amendment to Section 50 Trade Practices Act

A Provision To Cap Market Dominance

Proposed Preliminary Draft for Reference to ACCC

- 50B (1) A corporation in trade or commerce that in its own right, or in aggregate with related corporations, selling greater than XX% of the grocery lines sold by supermarkets shall not acquire or open an additional supermarket.*
- (2) *This section does not apply to a corporation that has obtained an authorisation from the [enforcement body], in respect of the acquisition or opening.*
 - (3) *For the purpose of this section supermarket means:*
 - (a) *a commercial premises;*
 - (b) *that offers grocery lines for sale at retail to the general public; and,*
 - (c) *that occupies an area open to the general public that is not less than 400 square meters.*
 - (4) *For the purposes of this section the calculation of the percentage of grocery lines as stated in 50(B) shall be by either:-*
 - (a) *Point of sale scanned data or*
 - (b) *Warehouse and distribution centre purchase data.*
 - (5) *For the purposes of this section 'grocery lines' means dry goods or frozen and chilled goods as specified by regulation by schedule under the separate headings of 'dry goods', 'frozen' and 'chilled.'*
 - (6) *For the purpose of this section, the date at which the percentage of grocery lines sold is to be calculated shall, in the case of an acquisition, be the date at which the acquisition occurred; or in the case of an opening, the date of opening of the supermarket or supermarket extension to the public.*

Attachment TWELVE
Supplementary Submission TIW
Joint Parliamentary Committee Inquiry –Retail Chain Dominance

- (7) *For the purposes of this section, opening does not include the re-opening of a supermarket that has been temporarily closed and which was at the time of the temporary closure was owned by the corporation or a related corporation.*

Suggested Advantages:

- It has the facility to cover local markets which are not caught up in the existing provisions of the Act, which in terms of market definition remain rather fuzzy, and because of this government departments tend to err on a relatively wide definition. As a consequence 'due process' takes much longer and more costly to assess. Hence it is correct to observe that the administrative practice in the past has been to take a wide interpretation with a tendency to make the market so large it does not become an actionable problem.
- The section as it currently stands does not catch in its net creeping acquisitions. As constructed this provision should catch such activities because with a mandatory reporting system in place, acquisitions in regional areas which might not previously come to the notice of the ACCC, would do so now under the suggested proposal.

PROPOSAL TWO – Amendment to Section 46

A Provision to Prevent Anti-competitive Price Discrimination by Certain Corporations.

Proposed Preliminary Draft for Reference to ACCC

- 46C (1) *A declared corporation shall not engage in the practice of price discrimination.*
- (2) *For the purposes of this section, a declared corporation shall be deemed to have engaged in the practice of price discrimination if:*

Attachment TWELVE

Supplementary Submission TIW

Joint Parliamentary Committee Inquiry –Retail Chain Dominance

- (a) *the declared corporation's discrimination percentage is greater than 10%, and*
- (b) *the declared corporation is unable to satisfy the Court on the balance of probabilities that the amount of the discrimination percentage in excess of 10% was attributable to:*
 - (i) *significant structural changes affecting the corporation or customers of the corporation;*
 - (ii) *significant though temporary shocks affecting the corporation or customers of the corporation;*
 - (iii) *specific events that were not within the control of the corporation;*
 - (iv) *a change in the business of the declared corporation, not being a change that discriminates between MC and OC customers.*
- (3) *The discrimination formula used to calculate the discrimination percentage is:
{A formula that produces a percentage difference between major customers and other customers}*
- (4) *Within 1 month of filing its annual report, a declared corporation shall furnish in audited form to the ACCC or sub-nominated authority.
{the data that is necessary to calculate the discrimination formula}*

Suggested Advantages:

- *Génerates a transparency in pricing to minimise potential abuse of market power by the major chains. Assists in ensuring that the independents are not unduly discriminated against in terms of price and therefore not prohibited entry in a de facto sense from entering the market in competition against the major chains, should they so desire.*
- *Not against the concept of competition per se, just helping to define the boundaries to ensure a relatively even playing field does exist for all participants.*
- *This new clause would work in reality in a very targeted fashion. Only the 'declared' large manufacturers on the supply side would be effected, the very group most open to market abuse/bullying by the major chain supermarkets groups.*
- *Once in place would provide an effective 'hands off' system for the government. It would be the responsibility of their statutory regulator, the ACCC to put the reporting system in place and make sure it functions effectively.*
- *Would serve as a much-needed replacement to the old Section 49 which prohibited price discrimination on the basis that it is "of such a magnitude or of such recurring or systematic character". This new section automates this test by globally comparing the differences between major and minor accounts, and if those differences are greater than 10%, deems the conduct to constitute price discrimination.*
- *The old Section 49 was removed because it was found to be unworkable. This new approach should be proved to be both workable and effective in combating anti-competitive practices.*

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Supplementary Submission TIW
Joint Parliamentary Committee Inquiry –Retail Chain Dominance

PROPOSAL THREE- Amendment to Section 50

A Provision to Dilute Retail Dominance

- 50C (1) A corporation in trade or commerce that in its own right, or in aggregate with related corporations, sells greater than XX% of the grocery lines sold by supermarkets, shall within a period of five years of becoming reasonably aware of its position, use its best endeavours to [remedy].*
- (2) In the absence of evidence to the contrary, a corporation shall be deemed to ~~not have used its best endeavours to [remedy].~~*
- (3) A corporation shall be deemed to become reasonably aware when the corporation is informed by the [enforcement body] that it, in its own right, or in aggregate with related corporations, sells greater than XX% of the grocery lines sold by supermarkets in a stated region.*

Suggested Advantages:

- For the amendments to be effective all three need to be considered as a package, each tackling head-on particular elements of the anti-competitive environment which has emerged in the last few years.
- This provision which is consistent with the general thrust of existing and well practised American Anti-Trust legislation¹, needs to be in place to serve as a ‘full-back’ to the other two provisions, which seek to even out the current rather rough and uneven playing field of retail grocery commerce in Australia.

Sam Richardson
General Manager
Tasmanian Independent Wholesalers
Launceston
5 July 1999

¹ Refer detail contained in last section of the original NARGA submission.

Milk & Cream Pricing

The table below illustrates the advantage the Major Chain currently has compared to the Independents.

Whole Milk (1 Litre)	Independents		Chains
	Large	Medium	
Wholesale Price	111.0¢	117.0¢	102.8¢
Retail Price	130¢	135¢	130¢
Margin on Sell	19¢	13¢	27.2¢
Margin %	14.6%	13.3%	20.9%

Chains receive 1.5% Settlement Discount

Cream

Independents receive	-	Nil
Major Chain receive	-	2.5% Rebate
	-	6% Co-Op/Marketing

Orange Juice & Yoghurt

The table below illustrates the advantage the Major Chain currently has compared to the Independents.

Orange Juice

Independents receive	-	1% Rebate
	-	0.8% Co-Op/Marketing
Major Chain receive	-	7% Rebate
	-	6% Co-Op/Marketing

Yoghurt

Independents receive	-	1% Rebate
	-	5.61% Co-Op/Marketing
Major Chain receive	-	2.5% Rebate
	-	6% Co-Op/Marketing

Bread

The table below illustrates the advantage the Major Chain currently has compared to the Independents.

Branded

Independents receive - 2% Rebate

Major Chain receive - 2% Rebate
- 1% Co-Op/Marketing
- 5% Settlement Discount

Generic

Independent Net cost price - \$1.47

Major Chain Net cost price - \$1.26

} Retail Price \$1.95

Tasmanian Independent Wholesalers - Price Check as at 30/6/99

Product Description	Coles Sandy Bay	Purity Glenorchy	Purity Sandy Bay	Coles Meadow Mews	Roelf Vos Riverside	T.I.W. Festival
Four Roses Self Raising Flour 2kg	\$2.69	\$2.69	\$2.69	\$2.69	\$2.69	\$2.69
Sorbent Toiet Tissue 4 Pack	\$3.68	\$3.68	\$3.68	\$3.68	\$3.68	\$3.68
CSR White Sugar 2kg	\$2.75	\$2.75	\$2.75	\$2.75	\$2.75	\$2.75
Campbells Condensed Soups 420g	\$1.65	\$1.65	\$1.65	\$1.65	\$1.65	\$1.65
Cadbury 250g Block Chocolate	\$3.62	\$3.62	\$3.62	\$3.62	\$3.62	\$3.62
Coca Cola Soft Drink 1.25 Litre	\$2.13	\$2.13	\$2.13	\$2.13	\$2.13	\$2.13
Cottees Fruit Juice Cordial 2 Litre	\$3.99	\$3.99	\$3.99	\$4.15	\$4.15	\$4.15
Flora Table Spread 500g	\$2.29	\$2.29	\$2.29	\$2.29	\$2.29	\$2.29
Orchard Fresh Long Life Fruit Juice 2 Litre	\$3.39	\$3.39	\$3.39	\$3.39	\$3.39	\$3.39
Greenseas Tuna 425g	\$4.99	\$4.99	\$4.99	\$4.92	\$4.99	\$4.99
IXL Jam Spread 500g	\$2.86	\$2.86	\$2.86	\$2.86	\$2.86	\$2.86
Birds Eye Frozen Chips 1kg	\$2.95	\$2.79	\$2.79	\$2.79	\$2.79	\$2.79
Kleenex Tissues 224's	\$2.23	\$2.23	\$2.23	\$2.23	\$2.23	\$2.23
Huggies Disposable Nappies 32's Small	\$13.65	\$13.65	\$13.65	\$13.65	\$13.65	\$13.65
Huggies Disposable Nappies 36's X/Large	\$20.39	\$20.39	\$20.39	\$20.39	\$20.39	\$20.45
Pears Shampoo 400ml	\$3.59	\$3.79	\$3.79	\$3.59	\$3.59	\$3.65
Omo Laundry Detergent 1kg	\$5.33	\$5.33	\$5.33	\$5.33	\$5.33	\$5.35
Nescafe Instant Coffee 150g	\$6.89	\$6.89	\$6.89	\$6.89	\$6.89	\$6.90
Peters Ice Cream 5 Litre	\$9.59	\$9.59	\$9.59	\$9.28	\$9.28	\$9.29
Sanitarium Weet-Bix 750g	\$3.39	\$3.39	\$3.39	\$3.39	\$3.39	\$3.39
Pal Pet Dog Food 1.2kg	\$2.29	\$2.29	\$2.29	\$2.29	\$2.29	\$2.29
Whiskas Cat Food 400/410g	\$1.18	\$1.18	\$1.18	\$1.18	\$1.18	\$1.19
Bushells Leaf Tea 250g	\$2.69	\$2.69	\$2.69	\$2.69	\$2.69	\$2.69
Rosella Tomato Sauce 600ml	\$2.09	\$2.09	\$2.09	\$2.09	\$2.09	\$2.09
John West Pink Salmon 210g	\$3.05	\$2.97	\$3.05	\$3.05	\$3.05	\$3.09
Total	\$113.35	\$113.31	\$113.39	\$112.97	\$113.04	\$113.25