

# WOOLWORTHS LIMITED

A.B.N. 88 000 014 675

Michael Luscombe  
Chief Executive Officer

8 February 2008

Review of Australian Consumer Policy Framework  
Productivity Commission  
PO Box 1428  
CANBERRA CITY ACT 2616

By facsimile: (02) 6240 3311

Dear Sir/ Madam,

I am writing to you on behalf of Woolworths Limited ("**Woolworths**") to express our support for the introduction of uniform consumer legislation, as recommended by the Productivity Commission's Draft Report on the Review of Australia's Consumer Policy Framework (the "**Draft Report**").

Woolworths, as a national retailer of a broad range of consumer products, is uniquely placed to comment on the proposal for a uniform consumer legislation in terms of its potential effects on consumers and retail businesses. It is Woolworths' view that the implementation of a national consumer policy framework would result in significant benefits for consumers, businesses and regulators.

In particular, Woolworths supports the Draft Report's recommendation that a review of industry specific legislation in each jurisdiction be undertaken. Woolworths considers that industry specific consumer legislation should be limited to those areas where the generic framework does not adequately address the issues likely to arise and therefore provide appropriate consumer redress and that such legislation should be consistent in content and enforcement nationally.

It is Woolworths' experience that state legislation regulating specific retailing activities has different and at times inconsistent requirements, with no apparent consumer benefit arising from the different requirements and with significant compliance costs. For example, charitable fundraising is currently regulated on a state and territory basis. However, as activities to raise money for charitable causes are increasingly undertaken by organisations that operate nationally there is no apparent policy justification for maintaining different regulations in each state and territory.

Woolworths supports the Draft Report's recommendation that a national consumer policy framework should include provisions that facilitate compliance, education and the production of guidelines by regulators as a means of assisting consistency and certainty. Another key benefit of streamlining consumer policy and regulation across Australia will be the increased consistency in enforcement, whether enforcement is to be carried out by solely the ACCC or in a more consistent manner by the state fair trading offices.

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Finally, Woolworths fully supports the Productivity Commission's approach of evaluating proposals for reform of Australia's consumer laws using a cost-benefit analysis. In particular, Woolworths supports the Productivity Commission's taking into account of businesses' compliance costs when weighing up the potential advantages and disadvantages of the introduction of a generic consumer law.

Should you wish to discuss, please contact Peter Horton, Group General Counsel & Company Secretary on +61 2 8885 3680.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'M. Luscombe', written in a cursive style.

Michael Luscombe  
Chief Executive Officer  
Woolworths Limited