

[Received by email 30/7/08]

Further comment to draft report

Good Afternoon,

In general Woolworths agrees with the Annual Review of Regulatory Burdens on Business - Manufacturing and Distributive Trades - Draft Report recommendations. However there are a few additional comments that are worthy of mention to clarify and assist in formulating a recommendation. As well, there has been a proposal to introduce new legislation for Unit Pricing in Supermarkets, which was not included in the original submission.

7.4 Food Premises and assistance animals:-

Some additional information:-

In the past 5 to 7 years there have been many claims by customers that animals they wish to bring into Supermarkets are assistance animals. In that time, there has been two specific cases whereby customers have been denied entry into Woolworths Supermarkets because it was determined the animals they claimed as assistance animals were clearly not Guide or Hearing Assistance Dogs. A grievance was claimed with Human Rights and Equal Opportunity Commission (HR&EOC). HR&EOC required Woolworths to provide an explanation in defence that no discrimination had occurred. Both cases have been ongoing for several years and has cost Woolworths in excess of \$80,000 in legal fees (both in-house and external). These complaints have been protracted because there is no clear definition in either the Food Standards Code nor the Disability & Discrimination Act defining an 'Assistance Animal'.

Unit Pricing:-

Senator Fielding and the Qld Government are both proposing to introduce regulation for Unit Pricing (easy comparison of Grocery Prices). One of the main reasons given for the need to Regulate is they do not trust the industry (retailers) to self regulate and believe this will result in an inconsistent approach between retailers on how they will apply Unit Pricing. Therefore, Unit Pricing in this instance will be of little or no value to consumers and it will not be possible to compare prices between retailers.

Retailers would prefer to self regulate instead of the imposition of an additional regulatory burden. An argument could be offered to ensure consistency if Standards Australia or an Industry Body were to become involved and develop a 'Standard' for Unit Pricing, which may avoid the imposition of further Regulation.

Attached are copies of the Fielding Bill and the Qld RIS for Unit Pricing.

If either of these Bills are enacted as proposed the cost to Woolworths alone for new printers, new ticketing, software development, training etc will be in excess of \$30M and the Regulatory Burden to ensure ongoing Compliance will be significant.

<<Unit Pricing - Commonwealth.pdf>> <<RIS Unit Pricing - Qld.pdf>>

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[Attachments can be found at these web addresses]:

<http://www.justice.qld.gov.au/files/AboutUs/OFT - Unit pricing RIS.pdf>

<http://parlinfoweb.aph.gov.au/piweb/browse.aspx?NodeID=174>