

**Public submission by Woolworths regarding
“creeping acquisitions” Dated 18th June 2008**

I refer to my original submission dated 11th June 2005 in which I state that Since 1998 Woolworths have increased their number of supermarkets in Australia by 42.8%, and their actual supermarket trading area by 65%, by simply crushing their competition as stated in my submission.

Woolworths however, did not mention their liquor interests and have also increased their free standing liquor stores by 331% since 1998 by one course and one course of action only– “creeping acquisition”.

These numbers are from Woolworths Ltd trading results for those years and show that Woolworths does indeed have an “expansionist” policy.

**Public submission by Woolworths regarding
market definition and market concentration dated 18th June 2005**

Once again Woolworths Ltd are doing their best to convince this inquiry that they do not have the concentration of market power which in fact do.

It is with amazement that most Australians view the inability by politicians and the ACCC not to view a duopoly in supermarkets with the worst concentration of supermarket power on planet earth and grocery prices higher than any country in the developed world as anything but “lack of competition”.

The ACCC has a duty to the Australian people to instigate changes to The Trade Practices Act 1974 that will ensure a return to competition in food retailing in Australia that has been destroyed by the MSC due to unfair and illegal trading and buying practices. Those changes including many others which this writer is not qualified to comment upon should be:-

- A. The ACCC needs to be able to properly define "Market Area" as stated in section 46 of the Act.
- B. Geographic price gouging must be outlawed.
- C. Predatory pricing must be defined and outlawed.
- D. ALL monies given through discounts or gifts of any type including advertising subsidies by suppliers must be included in buying price reduction to all buyers or outlawed.

Both the Woolworths Ltd submissions to this inquiry dated 18th June use very flowery definitions and mind bending statistics which in fact amount to nothing, and are nothing but a blatant attempt to mislead this inquiry and should be treated as such.