

***UWU Submission to the ACCC
Supermarkets Inquiry 2024-25***

16 April 2024



Acknowledgement of Country

We acknowledge and respect the continuing spirit, culture, and contribution of Traditional Custodians on the lands where we work, and pay respects to Elders, past and present. We extend our respects to Traditional Custodians of all the places that United Workers Union members live and work around the country.

About United Workers Union

United Workers Union (UWU) is a powerful union with 150,000 workers across the country from more than 45 industries and all walks of life, standing together to make a difference. Our work reaches millions of people every single day of their lives. We feed you, educate you, provide care for you, keep your communities safe and get you the goods you need. Without us, everything stops. We are proud of the work we do – our paramedic members work around the clock to save lives; early childhood educators are shaping the future of the nation one child at a time; supermarket logistics members pack food for your local supermarket and farms workers put food on Australian dinner tables; hospitality members serve you a drink on your night off; aged care members provide quality care for our elderly and cleaning and security members ensure the spaces you work, travel and educate yourself in are safe and clean.

Introduction

We welcome the opportunity to provide a submission to the ACCC's inquiry into pricing and competition in Australia's supermarket sector (the Supermarkets Inquiry). In labour intensive industries across the supermarket supply chain, wages and working conditions are undeniably relevant to the commercial relationship between retailers, wholesalers, and suppliers. Yet workers are notably absent from consideration in the ACCC's consultation paper. UWU is uniquely placed to comment on this inquiry because we represent thousands of workers in the food and grocery supply chain, including warehouse workers directly employed by Woolworths and Coles, as well as third party logistics workers, food and beverage manufacturing workers and farms workers, whose work is directly impacted and influenced by the decisions of the major supermarkets.

It is well-known that Woolworths and Coles hold the largest share of market value in the supermarket sector; approximately 65%.ⁱ This makes Australia's food and grocery sector amongst the most highly concentrated in the world.ⁱⁱ Coles recently announced a \$1.1 billion full year profit at its recent full year results, while Woolworths announced its annual profit was \$1.6 billion.ⁱⁱⁱ Both results were more than 4% higher than the year before, showing that supermarkets are making huge profits while workers and consumers struggle with the cost of living.^{iv}

As two of Australia's largest private sector employers, Coles and Woolworths should be leading the way in setting fair pay and conditions rather than squeezing workers' wages. They could, if they chose, be the drivers of systematic improvements in the working and living conditions of workers in the industry. Instead, wage increases remain tightly controlled, and often workers are pushed to work harder and faster. Some workers worry that the constant pressure to fill orders within tighter timeframes could compromise safety standards.

Coles and Woolworths' market dominance, pricing and purchasing strategies exert considerable price pressure on suppliers, growers and labour hire companies further down the supply chain, creating a demand and a market for insecure and underpaid work. In the past two decades, supermarkets have consolidated their market share through transitioning to direct supply relationships with growers, seeking to source directly through a smaller number of larger suppliers and seeking to acquire and directly operate processing facilities.

Today, almost all horticultural operations of any size in Australia either supply Coles and/or Woolworths directly, or do so through a small number of large aggregators who specialise in supplying the supermarkets across a number of select product categories. Farm workers feed Australia, yet they are treated as if they are expendable, not essential. Whether picking fruit and vegetables or packing them, workers do physical, painful, repetitive work for hours on end, outside, often in extreme weather conditions. Not only is farm worker labour socially and economically undervalued, but farm workers are also routinely subjected to discrimination, racism, intimidation, and sexual harassment at work. Furthermore, a number of other studies confirm that workers in the farm industry are routinely underpaid.^v Addressing working conditions on farms requires addressing the price pressure at the top of the supply chain created by the supermarkets' market dominance.

Coles' recent acquisition of Saputo raw milk processing facilities in Victoria and NSW is a key example of why competition policy in Australia must be strengthened. This is a concerning

expansion of Coles' market power and there are real risks that Coles may use its position to drive down its own costs to the detriment of farmers and dairy process workers. Dairy processing jobs are often the backbone of local, regional communities and their loss can be devastating to those communities, yet the current approval process does not require the ACCC to take this into account (beyond a broad consideration of public benefit). The ACCC should be required to take labour market impacts into account when assessing applications for mergers or acquisitions, including the impact upon workers' rights, security of employment, and the likely impact on regional and rural employment.

While Woolworths and Coles rake in the profits, Australians are being hit hard by the cost-of-living crisis. Essential workers who work in early childhood education, aged care, disability support, cleaning, and many other low-paid industries are amongst those most affected, with many struggling to put food on the table. Many UWU members report that they have very little of their pay left after rent, bills and food are purchased. Some have also reported skipping meals in order to ensure their kids can get three square meals each day.

"I'm a single parent and I'm struggling financially to make ends meet and living pay check to pay check weekly. I have no savings for a rainy day and have no extra money to even begin to save for that. I've had to cut our food budget right down to \$150 a week and that barely covers the essentials at times, we have had to cut back on meat intake and dairy just to ensure we can eat 3 main meals, plus the school snacks which we have to make at home as its too expensive to buy" - Alana, early childhood educator

As Allan Fels acknowledged in his National Press Club address, a significant part of the cost-of-living crisis has been caused by companies taking advantage of their market power and relying on gaps in government policy to *"squeeze consumers, and often suppliers, to breaking point"*.^{vi} Many UWU members feel there is no doubt supermarkets are taking advantage of their market power and are squeezing workers as well.

The Australian Government must act to address the immense power Woolworths and Coles exercise across the supply chain. Alongside strengthening competition law and policy, it is critical that workers are recognised as key industry stakeholders and empowered to monitor workplace conditions. UWU recommends the creation of a worker voice mechanism across the supermarket supply chain, through which workers and unions could raise grievances on workplace issues and conditions with suppliers, wholesalers, and supermarkets and be able to access effective dispute resolution mechanisms, with penalties for employers in the supply chain who breach labour standards.

On 10 April 2024 the Labor Government announced that new regulations on mergers will be introduced from 2026, including that mergers above a yet-to-be-determined threshold and mergers which could significantly change market concentration will have to be notified and approved before going ahead, and that all mergers considered by the ACCC will be listed on a public register, with brief information including the names of the merger parties, a short description of the transaction and affected products and/or services, and the review timeline.^{vii} UWU broadly supports these changes (noting that detail is still yet to be released), commends the Labor Government for taking action to address this issue and urges the Government to take

further steps to ensure that worker's rights and labour market impacts are key considerations in competition policy.

UWU Recommendations

We call on the ACCC to make the following further recommendations:

1. A worker voice mechanism must be established across the supermarket supply chain. Educated and empowered workers are the most effective monitors of compliance with decent work standards.
2. The Australian Competition and Consumer Act should be amended to make it an offence to charge excessive prices.
3. The ACCC should have increased powers to initiate investigations into price and market studies to prevent and deter price gouging.
4. If and when mergers or acquisitions occur there should be a reverse onus of proof, so that applicants have to satisfy the ACCC that the merger is not anti-competitive, is in the public interest and would provide good jobs for working people. The ACCC should be required to take labour market impacts into account when assessing applications for mergers or acquisitions, including the impact upon workers' rights, security of employment, and the likely impact on regional and rural employment.
5. The merger test should be augmented to continue to prohibit mergers which substantially lessen competition but there should be an additional provision prohibiting mergers or acquisitions that give rise to substantial market power (a more structural and immediate test) and/or which entrench, create, or add to market power.

Warehouse workers share safety concerns at Woolworths

UWU members tirelessly pick and pack bulk orders in Woolworths' distribution centres and warehouses. The work primarily involves manual handling - shifting and stacking products onto pallets, including heavy 20kg boxes of soft drink or other bulk items. Their work also involves moving between warehouse aisles in forklifts, shifting products and then loading those products onto Woolworths trucks. All of these activities are timed.

However, at certain sites, Woolworths has recently started introducing shorter time frames for individual workers to complete orders, (sometimes called 'pick rates' or 'engineered standards'). UWU members have reported that there has been a lack of consultation about the introduction of pick rates and that inadequate consideration has been given to 'gap times'. A 'gap time' is when there is a delay in retrieving a product, this could be due to congestion in an aisle with other forklifts, stock missing in a bay within an aisle or a spillage on the floor – all matters which can result in a pick rate of less than the expected standard. Members also tell us that pick rate reports can be irregular. We have members reporting that they have worked to the same standard, yet the report shows rates of 100% one day, 60% the next. UWU members at certain sites have been told that, regardless of gap times, pick rates of less than 100% could result in disciplinary action.

UWU members emphasise how important it is to work carefully when performing manual handling, so as to reduce the risk of injury. One member shares his safety concerns about the implementation of pick rates at his worksite: ***“to meet their demands you have to work unsafely by breaking safety rules and so, accidents will happen”***.

For example, it is unwise to carry multiple boxes at a time when performing manual handling such as stacking a pallet and it is mandatory to slow down on the forklift when approaching a corner and honk the horn before turning. UWU members tell us it is these important safety procedures which could be jeopardised if pressure is placed on workers to work faster. One member told us:

“Speaking from nearly 7 years of experience working for Woolworths I have seen the rapid decline in care for its employees and contractors. Our safety standards are slipping with the constant push from our management team for us employees to hit higher and unrealistic KPI's on a daily basis. Many of my colleagues have suffered not only physical injuries but now the toll is starting to affect staff mentality”.

Another experienced UWU member (who has been in the industry for over 30 years) was given a large order to complete in 40 minutes, when from experience he knew it could take up to 70 minutes. ***“It's supposed to be a fair day's work for a fair day's pay but there has been no consultation at all about these new performance standards. Anything less than 100% results in performance management”***.

Our Woolworths delegates report that they are attending a significant number of performance management meetings, and that many members feel that pick rate targets are being used by management as grounds for issuing warnings, which ultimately can lead to termination. Almost 2000 UWU members are considering lodging grievances about the issue.

Many UWU members worry that they are being pressured to perform at a rate that compromises worker safety.

Labour hire workers

Labour hire workers work alongside directly employed permanent employees, but their employment is particularly precarious because of their casual status. One member shares his concerns that:

“If they don’t get good pick rates of 100% they get sent home early because they are not fast enough. Everyday Woolworths chooses each individual from a line up based on their pick rates. There is a huge turnover of casuals”.

Workers across the Supermarket Supply Chain

Low pay, poor working conditions, a lack of job and visa security, unsafe work conditions, unreasonable work demands, and reprisals against those who speak out - these issues arise all too often in supermarket supply chains and it is not by chance. The effects of Coles and Woolworths’ pricing and purchasing strategies are felt further down the chain, creating a demand and a market for insecure and underpaid work.

Whether picking fruit and vegetables or packing them, workers on farms do physical, painful, repetitive work for hours on end, outside, often in extreme weather conditions. The work often involves bending in awkward and unsafe positions. Vegetable pickers, for example, often work standing but bent over at 90 degrees picking vegetables from the ground 8-10 hours a day, 6 days a week. Not only is farm worker labour socially and economically undervalued (being amongst the lowest paid in Australia), but farm workers are also routinely subjected to discrimination, racism, intimidation, and sexual harassment at work. Furthermore, as noted earlier, multiple studies have confirmed that workers in the farm industry are routinely underpaid.^{viii}

In the farm industry, workers are often spoken of, spoken to, or spoken about, but are rarely listened to. For the industry to genuinely address and end exploitation, this attitude must change. Workers must be empowered and supported to police compliance in the industry and must be respected and recognised as key industry stakeholders.

Perfection 12: A group of 12 Union women who are fighting back after surviving sexual violence in the glasshouses of Perfection Fresh

In South Australia, 12 UWU members on farms have been subjected to sexual violence whilst at work. Their matter is currently before the Federal Court of Australia. Unable to reveal themselves publicly, yet still wishing to tell people about their fight for justice UWU has created an album, Bread & Roses, which gives voice to these migrant worker women and their experiences working on Perfection Fresh Farms in Australia.

Perfection Fresh is a key supplier of tomatoes and mini cucumbers to Coles and Woolworths, and it has failed in its legal duty to ensure a safe workplace for women. Orders from the big supermarkets keep companies like Perfection Fresh in business. Coles, Woolworths, and Aldi have huge power over their supply chain and should use it to hold their suppliers to account and demand those companies make changes to better protect workers.

Since the 'Perfection 12' lodged their sexual assault case, more workers have come forward with their own stories. One worker was told that if she wanted to continue working at Perfection Fresh she must not be in the union. Another worker who was employed by Perfection Fresh for seven years in their glasshouses incurred a severe shoulder injury as a result of unsafe practices at work. For example, he was expected to pick 80kg of cherry tomatoes per hour otherwise his job would be in jeopardy. This involved having to run between the vines in order to meet the targets, and he was having to constantly and repetitively stretch to reach the vines for up to 8- 10 hours per day. His shoulder injury has now impacted him to the extent that he has had to cease work.

Another worker at Perfection Fresh had his foot crushed by a palette dropped on him whilst he was mixing fertiliser. He stated that they had to mix 20 kilos of fertiliser at a time, producing 70 to 80 bags of fertiliser per day. He has incurred multiple workplace injuries (including knee, back and shoulder injuries) so that now he cannot walk without pain, let alone work. In his experience, workplace injuries were common in the glasshouses at Perfection Fresh. He felt that safety was not a priority. He continues to live with persistent pain, which keeps him awake at night. These are some of the experiences of workers at Perfection Fresh, which supplies to the major supermarkets.

Enterprise bargaining

Coles and Woolworths *increased* their margins throughout the pandemic, as supermarkets were recognised as an essential service and remained open.^{ix} In fact, Woolworths' business performance was so solid during the pandemic that they did not qualify for the federal government's JobKeeper payments.^x Neither did Coles.

Yet in enterprise bargaining, the supermarkets often tightly control wage increases for directly employed workers. For workers in the supply chain, pressure from the supermarkets is regularly cited as a reason to keep wages low, despite high supermarkets profits. One union official, with significant experience bargaining with bread manufacturers, stated that employers would seek to cap wage increases by arguing that they "couldn't pass on costs to Coles or Woolworths". Yet supermarkets appear to have no problem passing on costs to consumers, including the very same workers who have been short-changed at the bargaining table.

At one logistics site, Scott's Refrigerated Logistics, UWU members report they were told in a 2020 bargain that they couldn't have any more than a 2% wage increase because the company couldn't pass on costs to Coles or Woolworths. Three years later Scott's Refrigerated Logistics went into liquidation. Workers lost their jobs and struggled to obtain their redundancy entitlements. Meanwhile, Woolworths continues to expand their directly owned warehousing and logistics facilities.^{xi} Supermarket market power is increasing while workers, consumers, suppliers, and processors often lose out.

Worker voice: educated and empowered workers are the most effective monitors of compliance with decent work conditions

The level of influence and control supermarkets have on worker's wages and conditions is clear in the examples given within our submission. Only the active involvement of workers in the oversight of their industries will ensure that supermarket supply chains are free from modern slavery,

exploitation, and poor working conditions.^{xii} Central to this must be positive respect for workers' right to Freedom of Association, in line with Australia's international obligations. In particular there must be recognition of the key role of trade unions in educating and empowering workers to enforce their rights.

A dedicated worker voice mechanism would enable the raising of workplace issues and lead to better accountability. This is imperative in a supply chain becoming increasingly complex, due to the supermarket's demand for lower costs, tighter delivery deadlines, fluctuating order volumes and shorter supply contracts.^{xiii} Supermarkets should not be able to use their market power to divest themselves of their responsibilities to workers. Rather, supermarkets should be required to put workers front and centre of identifying and mitigating labour rights risks in their food supply chains.^{xiv}

Through the worker voice mechanism, suppliers, wholesalers, and retailers must be required to meet with workers and unions to hear and resolve their concerns. A worker voice mechanism should be established which ensures that workers and unions have a seat at the table, can lodge grievances, meet with the relevant suppliers, wholesalers, and retailers in the supply chain and know that those in supply chain who breach labour standards will face penalties for their actions. A worker voice mechanism is the key to ensuring worker safety, company transparency and accountability in the supply chain.

Concentration of market power

In the dairy industry Coles wields significant market power. Generally dairy farmers sell their raw milk produce to dairy processors, who then collect, treat, package and then sell on to the major supermarkets. However, last year Coles sought to acquire two raw milk processing facilities owned by Saputo Dairy Australia Pty Ltd, giving Coles direct control of much of the dairy supply chain in those regions. In July 2023, the ACCC issued a Statement of Issues regarding the proposed acquisition by Coles, inviting submissions from interested parties. The ACCC's preliminary view was that the proposed acquisition may lead to Saputo exiting the market/s of raw milk in NSW, therefore substantially lessening competition. UWU opposed the acquisition due to the market concentration that would occur and the risk that Coles would use its position to drive down its own costs to the detriment of farmers and dairy process workers.

Nevertheless, the ACCC determined that the proposed acquisition was unlikely to substantially lessen competition and approved the purchase.

The formal transfer of the sites is due to be completed sometime before June 2024. However, Coles has already foreshadowed that it will invest in further automation in its dairy supply chain, which may create a handful of jobs, but it is unlikely to result in significant job creation at those sites. Rather, it will likely lead to significant job losses at other sites, the majority of which are in regional towns, as processors struggle to compete with Coles' increased market power in the dairy industry. It is an industry that has already been deeply impacted by the power of the supermarket duopoly. One of our delegates (with significant experience in the dairy industry) has concerns that, ***"Coles is prepared to sell milk at a loss in order to get you through the door and to make a profit elsewhere"***.

The Allan Fels Report into Price Gouging and Unfair Pricing Practices found that companies, including the major supermarkets, can charge high prices and/or price gouge lawfully as long as there is no unlawful collusion, which has given rise to a considerable policy gap.^{xv} As a result, the supermarket duopoly is currently free to charge high prices without reproach.^{xvi} Fels also found that the exercise of market power and limits on competition in specific markets have exacerbated inflation and increased cost of living pressures.^{xvii} Fels' broad recommendations were that Australia should strengthen its competition law (and policy) by establishing pre-merger notifications, by boosting the provisions of the merger test to prevent wider range of potentially anticompetitive mergers and by reversing the onus of proof in merger cases as recommended by the ACCC.^{xviii} Fels also found that there is insufficient competition in the food and grocery sector, as evidenced by poor price transmission to final customers.^{xix}

UWU supports increasing regulation on mergers and acquisition. If and when mergers or acquisitions occur there should be a reverse onus of proof, so that applicants have to satisfy the ACCC that the merger is not anti-competitive, is in the public interest, and would provide good jobs for working people. The merger test should also be augmented to continue to prohibit mergers which substantially lessen competition but there should be an additional provision prohibiting mergers that give rise to substantial market power (a more structural and immediate test) and/or which entrench, create, or add to market power.

Increasing market power: Coles' acquisition of Saputo sites

UWU continues to have the following concerns with the acquisition of two Saputo fresh milk processing facilities by Coles:

Increased bargaining power in the market

The acquisition will provide Coles with a significantly increased bargaining position in the dairy market. By having access to the dairy market from the farm to the storefront, Coles bargaining power will be increased on two fronts:

- Firstly, Coles will have access to market information at all stages of the market chain, including the costs of purchasing raw milk and the costs of processing.
- Secondly, Coles will use its position to drive down its own costs, including the costs of purchasing raw milk and the contracts it has with other processors.

The position and access that Coles will have to the whole market chain by taking ownership of processing facilities will allow Coles to leverage its position in the industry, which the UWU believes will lead to the minimisation of profits at other dairy processing companies. Reduced profits for these companies will adversely affect our member's pay and conditions in the short term and may in the long term threaten our members' job security.

Impact on the dairy market

The acquisition will allow Coles to significantly impact the dairy market. The Laverton and Erskine Park facilities are highly automated and function primarily to produce Coles private-label milk.

The UWU is aware that Coles has stated to Saputo and/or employees of the Saputo sites that Coles is considering or intending to insert cream-filing production lines at the Erskine Park site; and expanding the production of the Laverton site to include other Coles branded milk, such as flavoured milk.

If Coles expands into the areas of cream-filing and flavoured milk, then the market access that the acquisition would grant Coles would provide a significant advantage, and would likely allow Coles to frustrate competing brands, which would pressure other dairy processors.

As noted earlier, due to the highly automated nature of the Laverton and Erskine Park facilities, if Coles does expand into cream-filing and flavoured milk, it will not create more jobs in the industry; in fact, it will likely cause jobs to be lost at other producers as they face market pressure from Coles.

Dairy processing jobs are often the backbone of local, regional communities and their loss can be devastating to those communities. Historically dairy processing has provided secure, well-paid jobs, and their loss impacts not only the workers who lose their jobs but many other local businesses. This can be seen with Saputo's recent closure of its Maffra site.

The UWU is concerned that after acquiring the sites from Saputo, Coles may further expand into the dairy market, which would serve to increase its bargaining power. Expansion by Coles into the dairy market beyond the proposed acquisitions would make Coles a major player in the processing market. The UWU believes this would adversely affect dairy processors, dairy workers, and consumers.

Effect on raw milk producers

The UWU is concerned that the proposed acquisition will have a significant effect on raw milk producers. For the dairy industry to remain stable and fair, all sections of the market need to remain viable. The current position for raw milk producers, i.e. farmers, is in a process of recovery from the past decade of ecological pressures and the lowering of store milk prices by the major supermarkets, including Coles, which served to adversely affect the price of raw milk. The potential effect that Coles may have to drive down the farm-gate price for itself and the wider industry is a concern as the information that Coles would have access to as a result of the acquisition would allow it to pressure both farmers and producers to drive down costs.

Conclusion

UWU members are embedded within the supply chain at all stages, including directly employed by Coles and Woolworths, in third party logistics, in food and beverage manufacturing and on farms. It almost goes without saying that our major supermarkets, Coles and Woolworths, currently have unparalleled power in the supply chain. Efforts to improve the sector must recognise and address these pervasive supply chain price pressures, and Coles and Woolworths must take a leading role in raising standards and supporting the industry through fair pricing and fair conditions.

UWU recommends the implementation of a worker voice mechanism across the supermarket supply chain, to ensure that workers and unions have a seat at the table, can lodge grievances, meet with the relevant suppliers, wholesalers, and retailer in the supply chain and know that those in supply chain who breach labour standards will face penalties for their actions. A worker voice mechanism is key to ensure worker safety, company transparency and accountability in the supply chain. Educated and empowered workers are the best monitors of decent work conditions.

As stated earlier, UWU broadly supports changes recently announced by the Labor Government, to introduce a public register of mergers and regulation to ensure that mergers above a yet-to-be-determined threshold and mergers which could significantly change market concentration will have to be notified and approved by the ACCC before going ahead. We urge the ACCC to recommend further changes, in particular that if and when mergers or acquisitions occur there should be a reverse onus of proof, so that applicants have to satisfy the ACCC that the merger is not anti-competitive, is in the public interest, and would provide good jobs for working people, and that the ACCC should have to take into account the labour market impact of the merger or acquisition on workers' rights, security of employment, and the likely impact on regional and rural employment when assessing applications.

For more information about this submission, please contact Kate Edmondson, Research Analyst, at

Your sincerely,

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ⁱ *Inquiry Into Price Gouging and Unfair Pricing Practices*, Professor Allan Fels, February 2024, page 53, available at: https://pricegouginginquiry.actu.org.au/wp-content/uploads/2024/02/InquiryIntoPriceGouging_Report_web.pdf

ⁱⁱ Ibid, page 52.

ⁱⁱⁱ *Annual profit is more than \$1bn for Woolworths and Coles. How do they set prices and can they justify rises?*, The Guardian, 13 January 2024, available at: <https://www.theguardian.com/business/2024/jan/13/supermarket-price-gouging-claims-inquiry-woolworths-coles-prices#:~:text=The%20margins%20helped%20Coles%20post,annual%20profit%20to%20%241.6bn.>

^{iv} Ibid

^v Senate Education and Employment References Committee (2016). *A National Disgrace: The Exploitation of Temporary Work Visa Holders*, March 2016, Retrieved from:

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^{vi} <https://www.money.com.au/supermarket-price-gouging-allan-fels-actu-report#:~:text=In%20his%20address%20to%20the,suppliers%2C%20to%20breaking%20point%22.>

^{vii} <https://www.theguardian.com/australia-news/2024/apr/10/australia-acc-competition-policy-changes-inflation-jim-chalmers>

^{viii} Senate Education and Employment References Committee (2016). *A National Disgrace: The Exploitation of Temporary Work Visa Holders*, March 2016, Retrieved from:

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^x *'Woolworths opt out of \$4 billion JobMaker scheme unveiled in budget'*, Sydney Morning Herald, 14 October 2020,

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^{xii} Media Release: *Coles AGM: Company urged to address Modern Slavery*, Australasian Centre For Corporate

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^{xiii} *Modern Slavery in Global Supply Chains: the state of evidence for key government and private approaches*, Justice

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^{xiv} Media Release: *Coles AGM: Company urged to address Modern Slavery*, Australasian Centre For Corporate Responsibility, 14 November 2019, available at: <https://www.accr.org.au/news/coles-agm-company-urged-to-address-modern-slavery/>

^{xv} *Inquiry Into Price Gouging and Unfair Pricing Practices*, Professor Allan Fels, February 2024, page2, available at: https://pricegouginginquiry.actu.org.au/wp-content/uploads/2024/02/InquiryIntoPriceGouging_Report_web.pdf

^{xvi} Ibid, page 53

^{xvii} Ibid, page 3.

^{xviii} Ibid, page 9.

^{xix} Ibid, page 56.