



30 July 2020

Mr Kai Fu
Director - Merger and Authorisation Review Division
Australian Competition and Consumer Commission
Level 17
2 Lonsdale Street
Melbourne NSW 2000

By email: 

Dear Kai

Coles Group application for authorisation on behalf of itself and participating supermarkets AA1000477 - Woolworths Group Limited (Woolworths) submission regarding draft determination

We refer to the draft determination issued by the Australian Competition and Consumer Commission (the **ACCC**) on 15 July 2020 in respect of the application for authorisation AA1000477 (**Draft Determination**).

Woolworths is supportive of the proposed authorisation set out in the Draft Determination. Woolworths considers the proposed end date of 31 March 2021 to be appropriate given the uncertainty in the developing public health position in Australia. The ongoing community transmission of COVID-19 (particularly in Victoria but also elsewhere in Australia) has re-enlivened anomalies in consumer demand and disruptions to supply chains. Woolworths considers that the Draft Determination will facilitate an appropriate framework within which authorised parties can respond collaboratively to the public health situation on short notice, as required, in the interests of Australian consumers, until March of next year. Further engagement closer to March may be required if there is an apparent case for an extended period of authorisation.

Woolworths does not consider a pre-decision conference to be necessary in this matter. However, should the ACCC convene a pre-decision conference, Woolworths requests that it be invited to attend.

Yours sincerely,
WOOLWORTHS GROUP LIMITED



Nerilee Telford
Group Counsel - Competition and Compliance
Legal Services