



24 June 2016

The General Manager  
Fair Work Commission  
80 William Street  
SYDNEY NSW 2000

Dear General Manager,

**AM2014/67 – Application by the Coal Mining Industry Employer’s Group to limit redundancy payments under clause 14 of the *Black Coal Mining Industry Award 2010***

I refer to the above matter and to the directions issued by the Commission on 8 December 2015. In accordance with the directions, the CFMEU has filed the following material:

1. [Written submissions dated 24 June 2016.](#)
2. A [witness statement and expert report by Professor David Peetz](#) of Griffith University dated 23 June 2016.
3. A [witness statement by Gavin White](#) and attached report summarising the results of a telephone survey conducted by Essential Research and dated 24 June 2016.
4. A [witness statement by Andrew Vickers](#) dated 22 June 2016.
5. A [witness statement by Peter Colley](#) dated 23 June 2016.
6. A [witness statement by Robert Timbs](#) dated 9 June 2016.
7. A [witness statement by Anthony Fardell](#) dated 20 June 2016
8. A [witness statement by Barry Elliott](#) dated 20 June 2016
9. A [witness statement by Craig Trusty](#) dated 15 June 2016
10. A [witness statement by Daniel Watson](#) dated 20 June 2016
11. A [witness statement by Dennis Edwards](#) dated 18 June 2016
12. A [witness statement by Geordie Esthateo](#) dated 23 June 2016

13. A [witness statement by Mark Wallace](#) dated 9 June 2016
14. A [witness statement by Paul Byron](#) - unsigned
15. A [witness statement by Robert Bennett](#) dated 20 June 2016
16. A [witness statement by Wayne Saunders](#) dated 17 June 2016
17. A [witness statement by Wilf O'Donnell](#) dated 13 June 2016

Please advise the writer if the Full Bench would like hard copies of the above documents filed or if there are problems with the filing of the documents.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Alex Bukarica', with a stylized flourish at the end.

Alex Bukarica  
National Legal Director