

13 April 2022

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**By email only: [Chambers.Ross.j@fwc.gov.au](mailto:Chambers.Ross.j@fwc.gov.au)**

Dear Associate,

**AM 2020/99, AM 2021/63, AM 2021/65: Digital Hearing Book**

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We continue to act for the Australian Nursing and Midwifery Federation (ANMF).

We refer to the Full Bench Statement of 6 April 2022 [2022] FWCFB 52 and paragraph [5] concerning comments in relation to the draft digital hearing book index.

#### **ANMF Expert Witness Statements**

The ANMF notes that the following ANMF witness statements have been omitted from the draft index:

1. **Expert report/statement of Honorary Associate Professor Anne Junor** dated 28 October 2021. The expert report/statement is at item 17 in the ANMF's index filed on 29 October 2021; and
2. **Expert report/statement of Associate Professor Meg Smith and Dr Michael Lyons** dated 26 October 2021. The expert report/statement is at item 24 in the ANMF index as filed on 29 October 2021.

It may be that these expert reports/statements were inadvertently omitted from the draft digital hearing book index as they were described as reports in the ANMF index.

The ANMF requests that the expert report/witness statements referred to above be included in the digital hearing book.

#### **ANMF Tender Bundle**

The ANMF's tender bundle as filed on 29 October 2021 has not been included in the digital hearing book. This material contains a set of documents referred to and relied upon in the various ANMF witness statements and so form part of the evidence of the witnesses.

For example in Ms Butler's statement she refers to documents ANMF 1 to ANMF 58 in the tender bundle; Mr Bonner's statement refers to ANMF 5, ANMF 12 - 13; ANMF 26 - 27; ANMF 32, ANMF 58, ANMF 78 and ANMF 96 to 103 in the tender bundle; and Ms Bryce's statement refers to ANMF 2, ANMF 23 - 24 and ANMF 74 to 89.

Suffice to say that each of the documents in the tender bundle is referred to in the ANMF's witness statements.

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Accordingly we request that the **ANMF Tender Bundle** as filed on 29 October 2021 as Part C of the Index and comprising **ANMF 1** to **ANMF 110** be included in the digital hearing book.

If you require any clarification in relation to the matter please do not hesitate to contact the undersigned.

Yours sincerely



Nicholas White  
Principal Lawyer  
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