

Form F46 – Application to vary a modern award

Fair Work Act 2009, ss.157–160

This is an application to the Fair Work Commission to make a modern award or make a determination varying or revoking a modern award, in accordance with Part 2-3 of the [Fair Work Act 2009](#).

The Applicant



These are the details of the person who is making the application.

Title	<input type="checkbox"/> Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Ms <input type="checkbox"/> Other please specify:		
First name(s)			
Surname			
Postal address	1 Woolworths Way		
Suburb	Bella Vista NSW		
State or territory	NSW	Postcode	2153
Phone number		Fax number	
Email address			

If the Applicant is a company or organisation please also provide the following details

Legal name of business	Woolworths Group Limited
Trading name of business	
ABN/ACN	
Contact person	Ms Jannifer Kerr

Does the Applicant need an interpreter?



If the Applicant has trouble accessing this information, please contact us. We can arrange to provide it in another format. You can find information about [help for non-English speakers](#) on our website.

Yes – Specify language

No

Does the Applicant require any special assistance at the hearing or conference (eg a hearing loop)?

Yes – Please specify the assistance required

No

Does the Applicant have a representative?



A representative is a person or organisation who is representing the applicant. This might be a lawyer or paid agent, a union or employer organisation, or a family member or friend. There is no requirement to have a representative.

Yes – Provide representative's details below

No

Applicant's representative



These are the details of the person or organisation who is representing the Applicant (if any).

Name of person	Ms Jennie Mansfield / Mr Adrian Morris		
Firm, organisation or company	Ashurst Australia		
Postal address	Level 11, 5 Martin Place		
Suburb	Sydney		
State or territory	NSW	Postcode	2000
Phone number	02 9258 6000	Fax number	02 9258 6999
Email address	Jennie.Mansfield@ashurst.com / Adrian.Morris@ashurst.com		

Is the Applicant's representative a lawyer or paid agent?

Yes

No

1. Coverage

1.1 What is the name of the modern award to which the application relates?



Include the Award ID/Code No. of the modern award

General Retail industry Award 2020 (MA000004).

1.2 What industry is the employer in?

Retail (specifically the retail sale of food, household goods and personal goods).

2. Application

2.1 What are you seeking?

Specify which of the following you would like the Commission to make:

- a determination varying a modern award
- a modern award
- a determination revoking a modern award

2.2 What are the details of your application?

To vary the award (the “GRIA 2020”) in accordance with the schedule attached to this application.

Attach additional pages, if necessary.

2.3 What are the grounds being relied on?

Using numbered paragraphs, specify the grounds on which you are seeking the proposed variations.



You must outline how the proposed variation etc is necessary in order to achieve the modern awards objective as well as any additional requirements set out in the FW Act.

- (a) In recent times, there has been an increase in food retailing by online sales.
- (b) In recent times, some food retailers have begun to fill online sales at a facility (an “online fulfilment facility”) separate to a supermarket or retail store.
- (c) The online fulfilment facility has a layout similar to a supermarket (with the facility arranged into rows or areas, with shelves or racks in each row or area and with items placed on the shelves for picking).
- (d) The online fulfilment facility is staffed by workers who stock shelves, pick orders, pack orders and assemble deliveries.
- (e) The workers at the online fulfilment facility perform work in the classifications in the GRIA 2020.

- (f) The proposed variations seek to make express (and thereby avoid doubt or scope for dispute) that a retail establishment for the purposes of the GRIA 2020 includes an online fulfilment facility.
- (g) The proposed variations meet the modern awards objective.
- (h) The Commission should be satisfied comfortably that the proposed variations are necessary to meet the modern awards objective.
- (i) The applicant is an employer covered by the GRIA 2020.
- (j) The applicant understands that Coles Supermarkets Australia Pty Limited and the Shop Distributive and Allied Employees' Association support the making of the application. The applicant has also consulted with the Australian Retailers Association.

Attach additional pages, if necessary.

Signature



If you are completing this form electronically and you do not have an electronic signature you can attach, it is sufficient to type your name in the signature field. You must still complete all the fields below.

Signature	
Name	Jennie Mansfield
Date	22 December 2022
Capacity/Position	Legal representative



Where this form is not being completed and signed by the Applicant, include the name of the person who is completing the form on their behalf in the **Capacity/Position** section.

PLEASE RETAIN A COPY OF THIS FORM FOR YOUR OWN RECORDS

**Schedule to Application to Vary a Modern Award
General Retail Industry Award 2020
Application by Woolworths Group Limited**

1. Insert into clause 2 of the GRIA 2020 (in alphabetical order):

Retail store means a store or shop open to the public for the retail sale or hire of goods and services to a customer.

Retail store employer means an employer that operates a retail store.

Online retail sales fulfilment facility means a facility operated by or for a retail store employer to fill orders for retail sales for a retail store employer placed by a customer online.

2. Insert at end of clause 4.1(b) of the GRIA 2020 to read:

including employees filling online orders at an online retail sales fulfilment facility

3. Amend clause 4.2 of the GRIA 2020 to read:

General retail industry means the retail sale or hire of goods or services for personal, household or business consumption (including such sales or hires online by a retail store employer) such as:

4. Amend Schedule A – Classification Definitions of the GRIA 2020 by deleting in each classification definition the phrase "at a retail establishment" and inserting instead the phrase "in the general retail industry".

IN THE FAIR WORK COMMISSION

Matter:

Applicant: Woolworths Group Limited

STATEMENT OF CHRISTOPHER JAMES HALL

I, Christopher James Hall of Level 5 /407 Elizabeth Street Surry Hills NSW 2010 say:

1. I am an employee of Woolworths Group Limited ("**Woolworths**").
2. I am the eCom Operation Model Lead and Hatted Chapter Lead for the Future Network Operations Chapter for Woolworths located at 407 Elizabeth Street, Surry Hills 2010 NSW. I have held the eCom Operation Model Lead role since February 2022. In this role I am responsible for the creation and delivery of operating models and facilitating the effective delivery of new initiatives for operations teams to deliver ongoing improvement to instore operational outcomes. I have also held the Hatted Chapter Lead for the Future Network Operations Chapter since September 2022. In this role I lead a chapter of eCom Operations Leads to ensure that they have the capability to perform their roles.
3. I was previously the site manager for the customer fulfilment centre located at Building 5, Central West Business Park, 9 Ashley St West Braybrook, Victoria ("**Footscray CFC**") from August 2021 to February 2022.
4. I have also previously held the role of site manager for the customer fulfilment centre located at 40 Howleys Rd, Notting Hill, Victoria ("**Notting Hill CFC**"). I held this role from November 2020 to August 2021.
5. I was also previously involved in the establishment of the eStore located at 100 Hall Rd, Carrum Downs, Victoria ("**Carrum Downs eStore**"). I developed the processes used at the Carrum Downs eStore. I was involved at the Carrum Downs eStore from November 2019 to November 2020.

CFCs

6. Currently, Woolies X (a division of Woolworths) operates seven customer fulfilment centres ("**CFCs**") in Australia – four in NSW (the Brookvale CFC, the Lidcombe CFC, the Mascot CFC and the Caringbah CFC), two in Victoria (the Footscray CFC and the Notting Hill CFC) and one in Queensland (the Rochedale CFC). I have visited each of these CFCs.
7. Based on my roles as site manager, I understand that the four CFCs in New South Wales operate in the same way as the Footscray CFC and the Notting Hill CFC and engage team members in the same way as the Footscray CFC and the Notting Hill CFC.
8. Based on my roles as site manager, I also understand that the Rochedale CFC operates in the same way and engages team members in the same way as the New South Wales and Victorian CFCs, although the Rochedale CFC has a direct-to-boot functionality where customers can collect their online orders from the CFC. Annexed and marked "**CH-1**" is a photograph of the direct-to-boot pick-up area at the Rochedale CFC.

9. Currently, Woolies X uses each CFC to fill orders placed by customers of Woolworths using a Woolworths website or the Woolworths App. Currently, Woolworths uses two websites.
10. Currently, no CFC is open to the public. Currently, only authorised employees or authorised contractors are able to access a CFC. For customers who use the direct to boot service, they can attend the CFC location but are not permitted inside the CFC, they are only permitted in the direct to boot parking bays.
11. Each CFC is laid out in a similar way to a Woolworths supermarket. Each of the CFCs contains aisles with shelves on which items are placed. Each of the CFCs contains a freezer area and a chilled area (for dairy items, for meat and for seafood). Each of the CFCs contain a bakery section, a deli section and a produce (fruit and vegetable) section. Each of the CFCs contains a loading area (to receive items on crates for placement onto the shelves or in the freezer and chilled items area in the CFC) and a delivery area (to load packed items onto trucks to be delivered to customers). Annexed and marked "CH-2" is a copy of the layout for the Notting Hill CFC which identifies the key areas of a CFC.
12. Each CFC does not contain manned checkouts or service areas, except for a small "team shop" in each where team members can make personal purchases.
13. Each CFC is managed by a CFC Manager. Currently, the CFC Manager at Lidcombe CFC was previously a Store Manager for the Woolworths Supermarket at Auburn. Currently, the CFC Manager at Mascot CFC was previously a Store Manager for the Woolworths Supermarket at Marrickville Metro.
14. Each CFC uses team members to stock shelves, to bake, to cut and prepare meats and seafood, to pick items, to pack items and to move packed items to delivery trucks. Each CFC uses team members from a "replenishment team" to stock shelves (or, in some instances, merchandisers from a bakery (such as Tip Top) to stock shelves). Each CFC uses bakers to bake the bread and bakery items.
15. Dondu Agar and Phung Trinh are currently replenishment team members at the Footscray CFC and were previously Night (replenishment) Team Members at the Braybrook Supermarket. Currently, some of the team members of the replenishment team at the Lidcombe CFC were previously team members of the Night (replenishment) team at the Woolworths Supermarket at Chullora.
16. In my view, and based on my experience in working in Woolworths Supermarkets, the skills used by a replenishment team member to stock shelves in a CFC are virtually the same used by a Night (replenishment) team member to stock shelves in a Woolworths Supermarket or a Woolworths Metro Store, although replenishment team members in a CFC are not required to serve customers in a physical sense.
17. Each CFC has bakers and deli team members. Some of those team members who currently work at the Lidcombe CFC were previously team members at the Woolworths Supermarket at Leichhardt. Joseph Sacca, a Qualified Trade Baker at Lidcombe CFC was previously a Qualified Trade Baker at Woolworths Leichhardt. Dianna Tam, a Deli Team Member at

Lidcombe CFC was previously a Deli Team Member known as a Fresh Service Team Member at Woolworths Chullora.

18. In my view, and based on my experience in working in Woolworths Supermarkets, the skills used by the bakers in a CFC are virtually the same as those used by the bakers in a supermarket or store, although they do not need to display or merchandise any of the products or serve customers in a physical sense.
19. In my view, and based on my experience in working in Woolworths Supermarkets, the skills used by the deli team members in a CFC are virtually the same as those used by the deli team members in a supermarket or store, although deli team members in a CFC do not need to set up the display cabinet and serve customers in a physical sense.
20. Each CFC has a team of online personal shoppers. Currently some online personal shoppers at each CFC were previously team members at Woolworths Supermarkets.
21. Each CFC has a section containing alcohol. The section is managed by the Endeavour Group Limited. The section is separate from the rest of the CFC. The team members working in the section have a special security access card that enables them to enter the section. Where appropriate the team members working in the section have a Responsible Service of Alcohol qualification including team members who are the nominated licensee working in the CFC or employees working in direct-to-boot in the Rochedale CFC.
22. In my view, and based on my experience in working in Woolworths Supermarkets, the skills, processes and devices including handheld electronic devices used by an online personal shopper to pick an order in a CFC are virtually the same as those used by an online personal shopper in Woolworths Supermarkets to pick an order in a supermarket although personal shoppers in a CFC are not required to serve customers in a physical sense.
23. Each CFC uses the same process to fill an order:
 - (a) First, the order is received electronically by the CFC;
 - (b) Secondly, the order is divided electronically among online personal shoppers to pick the items. The CFC is divided into different temperature zones (chilled/fresh, freezer and ambient) and a section containing alcohol, and the order is divided and allocated to different online personal shoppers based on these different zones;
 - (c) Thirdly, an online personal shopper is directed (via a hand held electronic device) to a section of the bakery, deli or produce sections in the ambient zone to collect bakery items, general merchandise, grocery or produce items;
 - (d) Fourthly, an online personal shopper collects the bakery, general merchandise or grocery produce items and places them in a bag inside a storage container (where applicable) (the "customer tote") on a trolley;
 - (e) Fifthly, an online personal shopper is directed to a section of the freezer area to pick items in the freezer area;

- (f) Sixthly, an online personal shopper places the items from the freezer into a bag inside a customer tote on a trolley;
- (g) Seventhly, an online personal shopper is directed to a section of the chilled/fresh area to pick items in the chilled/fresh area;
- (h) Eighthly, the online personal shopper places the items from the chilled area into a customer tote on a trolley;
- (i) Ninthly, an online personal shopper is directed to the section containing alcohol to pick alcoholic or related items;
- (j) Tenthly, an online personal shopper places the alcoholic and related items in a tote on a trolley;
- (k) Eleventh, once each online personal shopper has picked all the items on their list from their allocated zone(s), they take the trolley with those items to the staging area;
- (l) Twelfth, a despatch team member collects the trolley and groups the packed items from the trolley with the other items packed from the same store zone that are part of the same delivery truck run;
- (m) Thirteenth, a despatch team checks that all containers due to be delivered as part of the same delivery run are present, including items from the same customer order picked by different online personal shoppers in different zones of the CFC;
- (n) Fourteenth, a despatch team member takes the containers to the delivery area; and
- (o) Fifteenth, when the delivery truck is ready, a despatch team member loads the containers into the delivery truck.

The steps (d) to (j) set out above usually and largely take place simultaneously. (There are food safety rules that limit the time that certain items are permitted to be outside a freezer. The existence of such food safety rules results in multiple online personal shoppers being used to fill orders. Additionally, liquor licensing laws restrict the type of persons that are permitted to handle alcohol. Once again, the existence of such laws results in multiple online personal shoppers being used to fill orders).

eStores

- 24. Currently, Woolies X operates an eStore in Victoria (the “**Carrum Downs eStore**”) and one in Queensland (the “**Maroochydore eStore**”).
- 25. Based on my previous roles, I understand that the Maroochydore eStore operates in the same way as the Carrum Downs eStore and engages team members in the same way as the Carrum Downs eStore.

26. Each eStore incorporates a Woolworths Supermarket and an eCom floor. The Carrum Downs eStore is also attached to a BWS store.
27. Each of the eCom floors function as a large online section of the supermarket store with increased automation functionality to assist with the picking and packing of products.
28. Managers working in an eStore support work across both the eCom floor and the remainder of the eStore being the supermarket section.
29. Team members who work in an eStore perform the same roles, receive the same pay rates and rest breaks and are covered by the same Supermarkets Enterprise Agreement whether they work in the eCom floor or in the supermarket.
30. Each eStore is used to fill orders placed by customers of Woolworths by telephone or using a Woolworths website or the Woolworths App.
31. Currently, no eCom floor is open to the public. Only authorised employees or authorised contractors are able to access an eCom floor.
32. The eCom floor in each eStore has three main areas:
 - (a) An automated Order Storage Retrieval ("**OSR**") system (including Goods To Person ("**GTP**") and decant stations);
 - (b) A consolidation and merge area; and
 - (c) A Last Mile (despatch) area.
33. Annexed and marked "**CH-3**" is a photograph of the source totes in the OSR system. Annexed and marked "**CH-4**" is a photograph of the GTP station.
34. For the Carrum Downs eStore only, there is an additional area comprising shelves in aisles where high volume items are placed in multiple temperature zones. Annexed and marked "**CH-5**" are three photographs of the high volume temperature zone areas.
35. For the Maroochydore eStore only, there is an additional large automated (vertical) storage unit. Annexed and marked "**CH-6**" is a photograph of the vertical storage unit
36. Currently, the eCom floors of each eStore do not contain check outs or service areas. Annexed and marked "**CH-7**" is a copy of the layout for the Maroochydore eStore which identifies the key areas of an eStore.
37. The Carrum Downs eCom floor has a shelved area which contains shelves in aisles. It stores heavy and bulky items. An online personal shopper picks items from the shelves, places them into a bag in a storage container on a trolley and transports the trolley to the consolidation and merge area (for the items to be consolidated with other items picked and packed for the customer).

38. The large storage unit is computer operated and is known as an OSR system. It stores the items in a "source tote". It places the "source totes" vertically in larger storage containers. It uses a series of "shuttles" to transport the "source totes" to an online personal shopper working at a GTP station. The online personal shopper then removes the items needed to fill an order from the "source tote" to a "customer tote". The "autonomous mobile robot" transports the "customer tote" to a flow rack. A despatch team member (known as a Last Mile team member) then takes the "customer tote" from the flow rack to the consolidation and merge area (for the items to be consolidated with other items picked and packed for the customer).
39. If a customer orders items that are not stored in the eCom floor, an online personal shopper travels from the eCom floor to the Supermarket floor with a trolley, collects the item from a shelf in the Supermarket, scans the item using a reader, places the item in a bag inside the trolley, travels back to the eCom floor with the trolley and then travels to the consolidation and merge area (for the items to be consolidated with other items picked and packed for the customer).
40. From time to time, a customer in Victoria orders alcoholic items. In such a case, an online personal shopper travels from the Carrum Downs eStore to the BWS store with a trolley, collects the item from the BWS store, scans the items using a reader, places the item in a bag inside the trolley, travels back to the Carrum Downs eStore with the trolley and then travels to the consolidation and merge area (for the items to be consolidated with other items picked and packed for the customer). (In Queensland, a customer cannot order alcoholic items as part of an order placed on the Woolworths websites or the Woolworths App).
41. The consolidation and merge area contains work areas used by the Last Mile (despatch) team to consolidate items from the same temperature zone that have been picked from the shelved area, the large storage unit, the Supermarket floor and the BWS store.
42. The Last Mile (despatch) area contains pallets where (consolidated) packed items are organised and stored before placement into delivery trucks.
43. Each eStore follows a process to fill an order. The steps (c) to (f) and (k) to (m) set out below usually and largely take place simultaneously:
 - (a) First, the order is received electronically by the eStore. The order is split between items that can be filled in the eCom floor and any items that cannot be filled are sent for picking in the Supermarket section;
 - (b) Secondly, the order is divided electronically among online personal shoppers to pick the items. The eStore is divided into different temperature zones (chilled/fresh, freezer, ambient and security) and (in the Carrum Downs Store) a section containing alcohol, and the order is divided and allocated to different online personal shoppers based on these different zones;

- (c) Thirdly, an online personal shopper is directed to a specific aisle bay shelf in the shelved area to pick the item or items;
 - (d) Fourthly, the online personal shopper removes the item or items from the shelf and places it or them into a bag inside a tote on a trolley;
 - (e) Fifthly, the storage unit arranges for shuttles to bring "source totes" to an online personal shopper working at the GTP station;
 - (f) Sixthly, the online personal shopper removes items from the "source totes" and places them inside a bag in a "customer tote";
 - (g) Seventhly, the "customer tote" is shuttle fed to the flow rack;
 - (h) Eighthly, an online personal shopper takes the "customer tote" from the flow rack to the consolidation and merging area;
 - (i) Ninthly, an online personal shopper is directed to a shelf in a section of the Supermarket to pick items;
 - (j) Tenthly, the online personal shopper places the items into a storage container on a trolley;
 - (k) Eleventh, an online personal shopper is directed to the BWS Store (at the Carrum Downs eStore only);
 - (l) Twelfth, the online personal shopper places the alcoholic and related items in a tote on a trolley;
 - (m) Thirteenth, the online personal shopper takes the trolley to the consolidation and merge area;
 - (n) Fourteenth, once each online personal shopper has picked all the items on their list from their allocated zone(s) from the trolley they are placed with the other items packed from the same store zone that are part of the same delivery truck run;
 - (o) Fifteenth, the despatch (Last Mile) team checks all the containers due to be delivered as part of the same delivery run are present, including items from the same customer order picked by different online personal shoppers in different zones of the eStore; and
 - (p) Sixteenth, pending the delivery type when the delivery truck is ready, the despatch team member loads the containers into the delivery truck. Alternatively, if utilising "direct-to-boot" a despatch (Last Mile) team member delivers the order directly to the customer's boot once notification is received that they are in the "direct-to-boot" location.
44. Woolworths uses a single unloading area for both the eCom floor and the adjacent Woolworths Supermarket for all inbound deliveries. I refer to annexure "CH-7".

45. Woolworths employs team members to work in each eStore. Woolworths uses its team members in each eStore to stock shelves, to pick items, to pack items and to move packed items to delivery trucks. Woolworths uses its team members from a “replenishment team” (known as the Stock and Systems team) in each eStore to stock shelves or to fill the large storage unit. Woolworths uses its online personal shoppers in each eStore to pick items and pack items. Woolworths uses its team members from the Last Mile (despatch) team in each eStore (known as the Last Mile team) to move packed items from the consolidation and merge area to the delivery trucks for delivery to customers. Team members in an eStore can work across both the eCom floor and supermarket section of the eStore.
46. Woolworths provides training to the team members that work in each eStore. Some of the training relates to the eCom floor and some of the training relates to other matters. The training that relates to the eCom floor is of five hours’ duration. The training that relates to other matters such as the Code of Conduct, extends to working in the adjacent Woolworths supermarket section of the eStore.
47. Woolworths prepares rosters for team members that work in each eStore. On some occasions, the roster schedules a team member to work some of their ordinary hours in the eCom floor and some of their ordinary hours in the adjacent Woolworths Supermarket. On some occasions, an online personal shopper works in the eCom floor but travels to the adjacent Woolworths Supermarket floor to complete orders.
48. Each eStore is managed by an eStore Manager (the eStore Manager manages the entire site whilst the eCom Manager manages the online side of the site). Currently, the eStore Manager at Carrum Downs was previously a Store Manager for the Woolworths Supermarket at Middle Brighton, Victoria. Currently, the eStore Manager at Maroochydore eStore was previously a Store Manager for the Woolworths Supermarket at Warner, Queensland.
49. Each eStore has an operating structure involving:
- (a) An eStore Manager;
 - (b) An Assistant Store Manager (usually two), a Fruit & Vegetables Manager, a Bakery Manager, a Customer Service Manager, a Fresh Service Manager and a Fresh Convenience Manager reporting to the eStore Manager;
 - (c) A Grocery Manager and a Nightfill Manager reporting to the Assistant Store Manager;
 - (d) A Grocery Assistant Department Manager reporting to the Grocery Manager;
 - (e) A Nightfill Assistant Department Manager reporting to the Nightfill Manager;
 - (f) A Fruit & Vegetables Assistant Department Manager reporting to the Fruit & Vegetable Manager;
 - (g) A Bakery Assistant Department Manager reporting to the Bakery Manager;

- (h) A Customer Service Assistant Department Manager reporting to the Customer Service Manager;
 - (i) A Fresh Service Assistant Department Manager reporting to the Fresh Service Manager;
 - (j) A Fresh Convenience Assistant Department Manager reporting to the Fresh Convenience Manager; and
 - (k) An eCom Manager reporting to the eStore Manager.
50. Annexed and marked “**CH-8**” is a true copy of the organisational chart for the Maroochydore eStore.
51. In my view, and based on my experience in working in Woolworths Supermarkets, the skills used by a replenishment team member to stock shelves in an eStore are virtually the same as those used by a replenishment team member to stock shelves in a Woolworths Supermarket or a Woolworths Metro Store. (The difference is that a replenishment team member in an eStore in some instances utilises automation technology processes to stock shelves in an eStore).
52. In my view, and based on my experience in working in Woolworths Supermarkets, the skills used by the online personal shopper to pick an order in an eStore are virtually the same used by an online personal shopper in Woolworths Supermarkets to pick an order in a supermarket. (The difference is that an online personal shopper in an eStore utilises the OSR to assist with the picking of an order in an eStore).

Woolworths Supermarkets

53. The Woolworths Supermarkets division operates Woolworths Supermarkets and Woolworths Metro Supermarkets.
54. Currently, Woolworths classifies its Supermarkets into three categories – Small Stores, Medium Stores and Large Stores.
55. Each Large Store has an operating structure involving:
- (a) A Store Manager (who performs the same role as an eStore Manager in an eStore);
 - (b) An Assistant Store Manager, a Fruit & Vegetables Team Manager, a Bakery Team Manager, a Customer Service Team Manager, a Fresh Service Team Manager, a Fresh Convenience Team Manager and a Store Services and Compliance Officer reporting to the Store Manager;
 - (c) A Grocery Team Manager and a Nightfill Team Manager reporting to the Assistant Store Manager (who perform the same role as a Grocery Manager and a Nightfill Manager in an eStore);

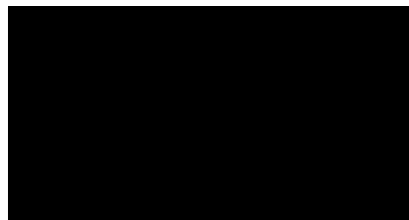
- (d) A Grocery Assistant Department Manager reporting to the Grocery Team Manager;
- (e) A Nightfill Assistant Department Manager reporting to the Nightfill Team Manager;
- (f) A Fruit & Vegetables Assistant Department Manager reporting to the Fruit & Vegetable Team Manager;
- (g) A Bakery Assistant Department Manager reporting to the Bakery Team Manager;
- (h) A Customer Service Assistant Department Manager reporting to the Customer Service Team Manager;
- (i) A Fresh Service Assistant Department Manager reporting to the Fresh Service Team Manager; and
- (j) A Fresh Convenience Assistant Department Manager reporting to the Fresh Team Convenience Manager.

Annexed and marked "CH-9" is a true copy of the organisational chart for the Large Store at Chullora.

Performance Metrics

- 56. Woolworths uses the same standard metrics to assess the performance of Woolworths Supermarkets, the CFCs and the eStores in filling customer online orders. The metrics include quality, accuracy and timeliness. Annexed and marked "CH-10" is a true copy of a Voice of Customer survey which is used to obtain these metrics as applicable.
- 57. Woolworths sends electronic surveys to its online customers which it invites its customers to complete. The survey is the same for Woolworths Supermarkets, the CFCs and the eStores. Annexed and marked "CH-11" is a true copy of an example survey. The reference to "Woolworths Online" in the survey is a reference to an order placed on a Woolworths website or the Woolworths App.

Signed:



Christopher James Hall

Dated:

20/12/2022

Annexure CH-1



Direct-to-boot pick-up area Rochedale CFC

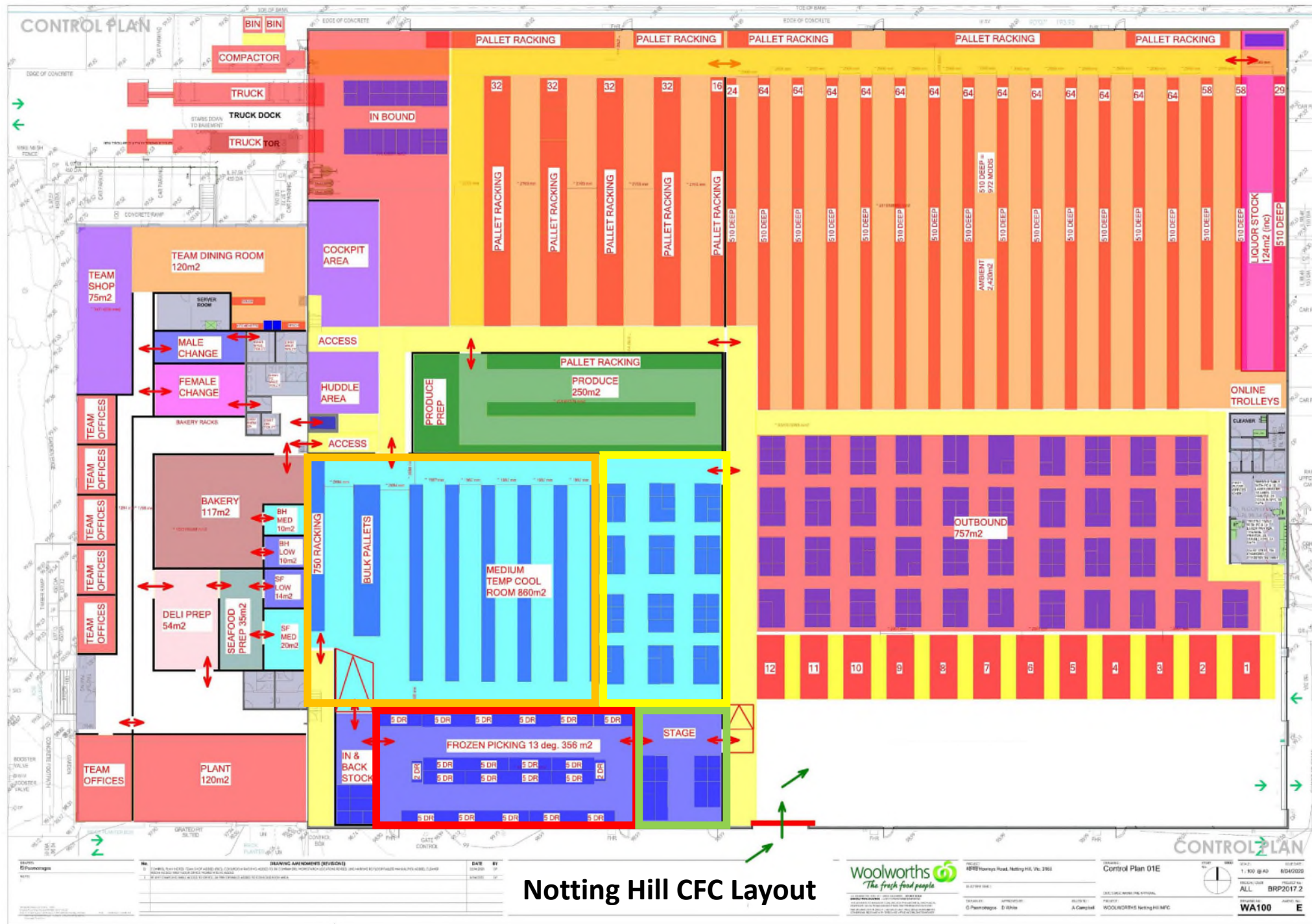
Annexure CH-2

Freezer Area: Including freezer chest bay and upright freezers for storage of products

Freezer Staging Area: Area for storage of staged freezer products prior to being consolidated for delivery

Chilled Area: Area for storage of chilled products

Chilled Staging Area: Area for storage of staged chilled products prior to being consolidated for delivery



Notting Hill CFC Layout

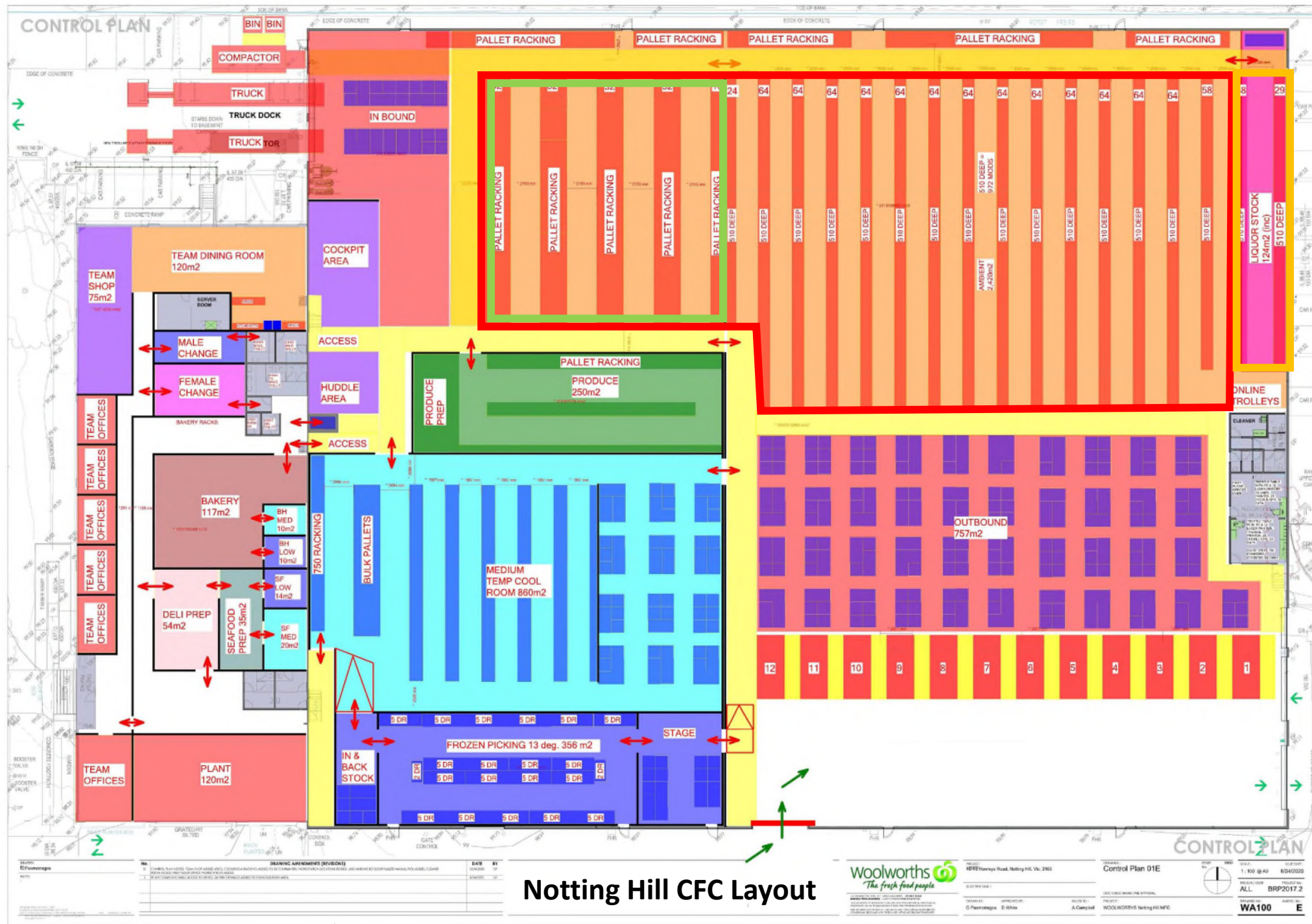
Woolworths
 The fresh food people

1180 @ AD
 BRP2017.2
 WA100 E

Ambient Area: Area for storage of ambient grocery products stored in aisles containing shelves

Bulk Products: Area for storage of heavy and bulky ambient grocery products including paper towels and soft drinks

Secure Alcohol Section: Locked area for storage of alcohol



Annexure CH-3



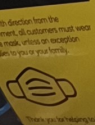
Source totes in OSR System

Annexure CH-4



Takeoff
Micro Fulfillment Center.
Transforming eGrocery.
Takeoff.com

Face masks mandatory



GTP
2

Working together
to be CovidSafe



colwatts

Takeoff

PAD

Annexure CH-5





AMBIENT

a little
to ever

Let's all
keep 1.5m
apart

Let's all
keep 1.5m
apart

High Volume Freezer Zone - Carrum Downs eStore



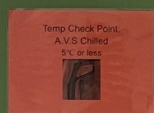
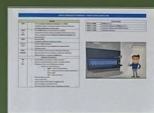
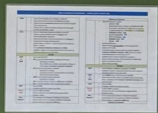
High Volume Ambient Zone - Carrum Downs eStore

Annexure CH-6

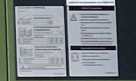
kardexremstar



When handing over orders, remember to check all zones including freezer, to prevent missing items.



Megamat RS 350



Vertical Storage Unit Maroochydore eStore

Annexure CH-7

eStore = The whole business including the supermarket shop floor AND the eCom floor.

Shop floor = Existing supermarket.

eCom floor = New floor housing the OSR.



Maroochydore eStore Floor Layout

Inbound Trucks area

Receiving Dock

- Store number 2763 shop floor
- Store number 2006 eCom floor

New Load Inbound=

eCom pallets will be held here for ambient stock to be decanted.

Chiller area = Top right - eCom pallets will be held here for Chilled

Freezer area = Top left - eCom pallets will be held here for Freezer staging



Maroochydore eStore Floor Layout

OSR = Order, storage and retrieval - this is where the products are stored so they can be retrieved for picking. This unit has 2 ambient lanes and 1 chilled lane

Decanting stations - Decanting is the process of putting items into storage totes to be stored in the OSR. There are 4 decanting stations.



Maroochydore eStore Floor Layout

GTP = Goods to Person

This is where team members will pick items out of storage totes, into customer totes.

Tote Induction = A conveyor feed that takes customer totes into the OSR ready for picking.

Open Shuttles will take the customer totes to the flow rack

OSR Flow Racks = A set of racks / tilted shelving to hold customer order totes prior to being moved to the consolidation and merge area.



Maroochydore eStore Floor Layout

Consolidation & Merge =

Consolidation brings all totes to the same physical location, Merge of customer totes is moving items from one tote to another and deleting the unnecessary totes. There are three consolidation and merge areas. Top left is the cool area, top right is the freezer area and the bottom right is the ambient area.

Automated Vertical Storage (AVS) =

utilises space previously unable to be utilised which extends up to our ceiling. This will double the capacity of your work area and make it safer to work.

- AVS will allow us to store both ambient and chilled totes within the unit.



Maroochydore eStore Floor Layout

Direct to Boot Area = instead of customers collecting their order from the customer service desk they will collect through the drive through area.

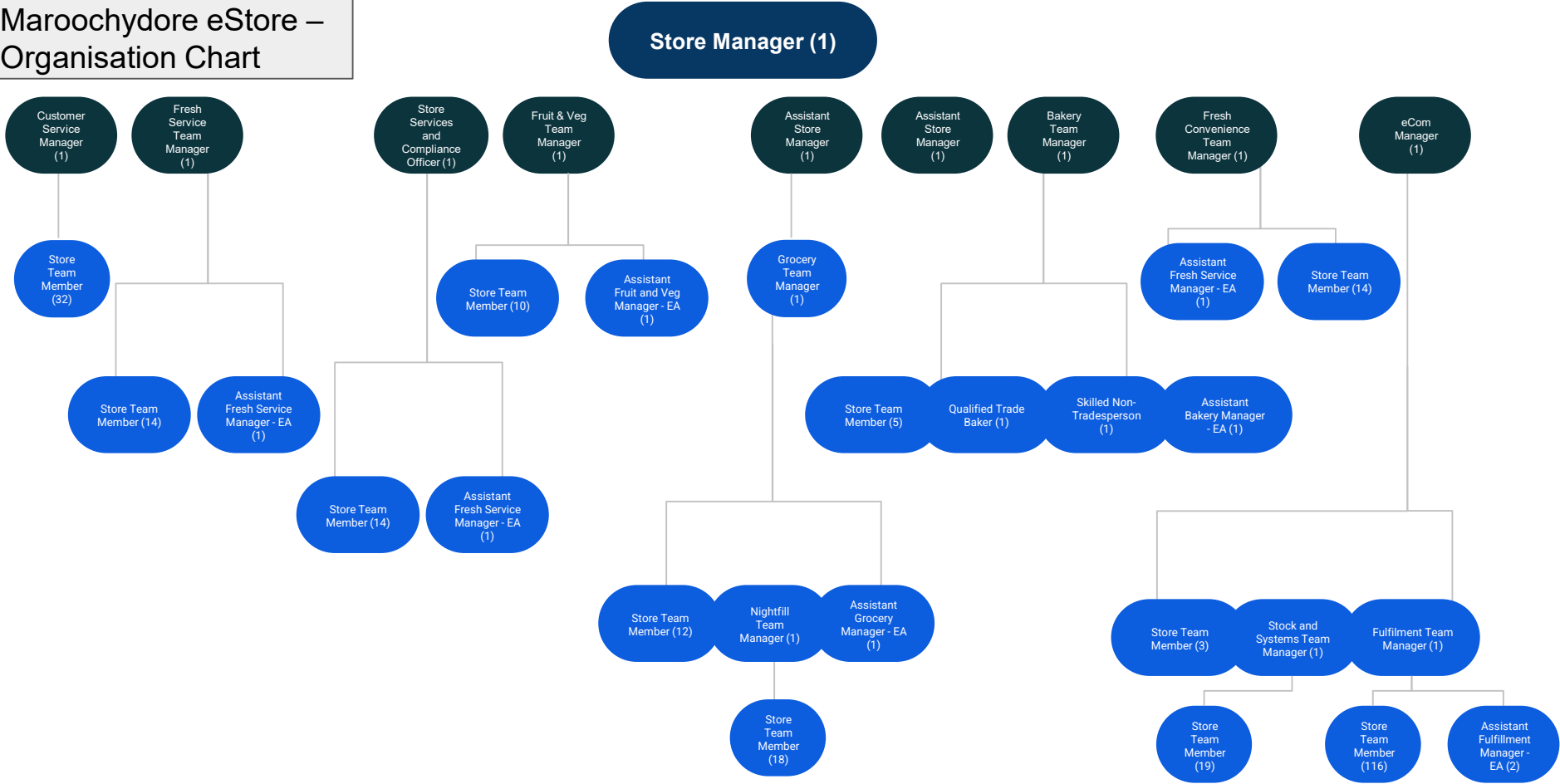
Outbound Trucks = this is where the trucks are loaded with outbound deliveries.



Maroochydore eStore Floor Layout

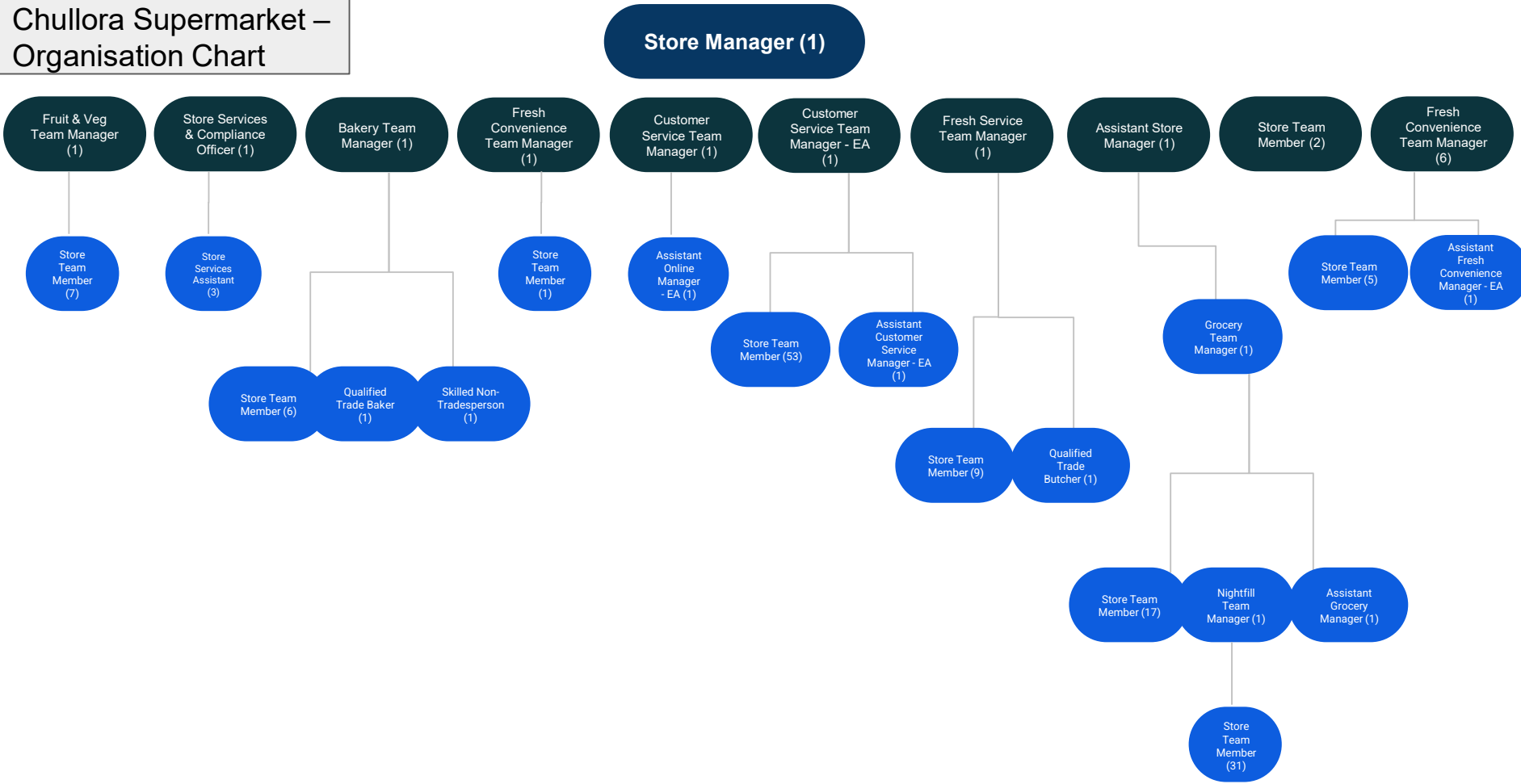
Annexure CH-8

Maroochydore eStore – Organisation Chart



Annexure CH-9

Chullora Supermarket – Organisation Chart



Annexure CH-10



English ▾

You can now take this survey in other languages! Just select the new options in the top right hand corner of this page.

→ Required

How likely are you to recommend **Woolworths Ashfield** to your relatives, friends and colleagues?

Not at all likely

Extremely likely

0	1	2	3	4	5	6	7	8	9	10
---	---	---	---	---	---	---	---	---	---	----

What are the reasons you gave this score?

Please be as detailed as possible, as your responses will be used to improve the service provided by the team.

Next

Annexure CH-11



English ▼

Thinking of your most recent experience with **Woolworths Online**, on a scale of 0 to 10, how likely are you to recommend **Woolworths Online** to your relatives, friends and colleagues?

Not at all likely

Extremely likely

0	1	2	3	4	5	6	7	8	9	10
---	---	---	---	---	---	---	---	---	---	----

What are the reasons you gave this score?

Please be as detailed as possible, as your responses will be used to improve the service provided by **Woolworths Online**.

Next

IN THE FAIR WORK COMMISSION

Matter:

Applicant: Woolworths Group Limited

STATEMENT OF CHRISTOPHER PETERS

I, Christopher Peters of Level 5 /407 Elizabeth Street Surry Hills NSW 2010 say:

1. I am an employee of Woolworths Group Limited (“**Woolworths**”).
2. I am the General Manager for eCom Store Operations for Woolies X (a division of Woolworths). I have held this role since August 2021.
3. I was previously the State General Manager – Queensland for Woolworths Supermarkets (another division of Woolworths). I held my previous role from October 2019 to July 2021.
4. I have worked for Woolworths since 1988. I have held other roles such as Assistant State Manager – NSW, ACT, South Australia and Northern Territory for Woolworths Supermarkets and General Manager, State Operations – South Australia and Northern Territory for Woolworth Supermarkets.

Woolies X

5. Woolworths has divided its operations into a number of divisions.
6. One division is known as “Supermarkets” and operates traditional supermarkets in shopping centres or standalone facilities across all States and Territories of Australia. A second division is known as “Woolies X” and operates or manages online sales in all States and Territories in Australia.
7. Currently, Woolies X is responsible for online shopping (including sales using the Woolworths website or the Woolworths App, with the sales being completed by home delivery, pick up in-store or “Direct to Boot”). Additionally, Woolies X is responsible for the Everyday Rewards loyalty program used by Woolworths (amongst other things).

CFCs

8. Woolworths operates a customer fulfilment centre (“**CFC**”) at 6 Hill Road, Lidcombe (the “**Lidcombe CFC**”). Woolworths uses the Lidcombe CFC to fill some of the orders placed by customers in the western suburbs of Sydney using the Woolworths website or the Woolworths App.
9. As at November 2022, the Lidcombe CFC is divided into areas:
 - (a) Ambient Area 1 (for bulky items)

- (b) Ambient Area 2 (for smaller items)
 - (c) Temperature Controlled Area
 - (d) Freezer
 - (e) Chiller
 - (f) Deli and Seafood Room
 - (g) Bakery Room
 - (h) Controlled Items Area.
10. Ambient Area 1 is used to store large bulky items (such as toilet paper, paper towels, dog food, nappies, large boxes of cereals and soft drink). The bulky items are stored on wooden pallets at ground level or on a shelf approximately two metres above ground level. (In some instances, bulky items are stored on an intermediate shelf). Ambient Area 1 is arranged into four aisles (numbered "1" to "4"). Photograph A of annexure marked "CP-1" is a photograph of the Lidcombe CFC which has been shown to me and depicts paper towels in the bulky items area.
 11. Ambient Area 2 is used to store individual grocery items. The items are stored on metal shelves. The items are sometimes kept in boxes on the shelves and are sometimes placed individually on the shelves. The shelves range from ground level to approximately two metres above ground level. The shelves are divided horizontally into bays and the bays are numbered. The shelves in a bay are also numbered vertically. Ambient Area 2 is arranged into 12 aisles (numbered "5" to "16"). Photograph A of annexures marked "CP-2" to "CP-6" are a series of photographs at the Lidcombe CFC which depict dog food, chips, vitamins, shampoo and sugar.
 12. The Temperature Controlled Area is used to store chocolate and some fruit and vegetables. The Temperature Controlled Area has a constant temperature of 14 degrees Celsius. The items are stored on metal shelves. The items are sometimes kept in boxes on the shelves and are sometimes placed individually on the shelves. The shelves range from ground level to approximately two metres above the ground. The Temperature Controlled Area is arranged into aisles (numbered "25" to "27" and "30"). Photograph A of annexure "CP- 7" depicts watermelons in a box in the temperature controlled area of Lidcombe CFC.
 13. The freezer is used to store frozen items (such as ice cream, frozen vegetables and pies) on freezer shelves (with doors) or in freezer cabinets. The items are placed individually on the shelves or in the cabinets. The shelves range from ground level to approximately two metres above the ground. The freezer is arranged into two aisles (numbered "17" and "18"). Photograph A of annexure "CP-8" depicts the shelves in the freezer area of Lidcombe CFC (including ice cream stored on the shelves). Photograph A of annexures "CP-9" and "CP-10" depicts the freezer chest in the freezer area of Lidcombe CFC (including individual bags of frozen chips and frozen vegetables stored in the cabinets).

14. The chiller is used to store cold items (such as milks, juices, cheese, yoghurts, butter, dips and some fruit and vegetables). The chiller has a constant temperature of 2 degrees celsius. The items are stored on metal shelves. The items are sometimes kept in boxes on the shelves and are sometimes placed individually on the shelves. The shelves range from ground level to approximately two metres above the ground. The chiller is arranged into aisles (numbered "19" to "24"). Photographs A of annexures "**CP-11**" to "**CP-13**" depict dips, juice and cheese in the chiller of Lidcombe CFC.
15. The Deli and Seafood Room of Lidcombe CFC is used to prepare, pack and store deli items and seafood. The room includes deli meat cutting tools, including meat slicers. Photograph A of annexure "**CP-14**" depicts a deli team member slicing meat using a meat slicer in the Deli and Seafood Room of Lidcombe CFC.
16. The Bakery Room of Lidcombe CFC is used to prepare, pack and store breads and similar items. The room includes ovens and bread slicing machines. The room also includes trolleys on which finished items are stored. Photograph A of annexure "**CP-15**" depicts a bakery team member preparing bread products in the Bakery Room.
17. The Controlled Items Area of Lidcombe CFC is used to store alcohol and cigarettes. The area is contained within a metal cage. The items are stored on metal shelves. The items are placed individually on the shelves. The shelves range from ground level to approximately two metres above the ground. Photograph A of annexure "**CP-16**" depicts one of the aisles in the Controlled Items Area (including wine and spirits stored on the shelves).
18. Woolworths engages approximately 1,000 team members to work in the Lidcombe CFC each week.
19. Some team members at the Lidcombe CFC are engaged to accept deliveries (usually on a pallet) from a distribution centre, transport the delivery to the relevant area on the floor (often using a pallet jack) and place the items forming part of the delivery onto the shelves in the relevant area on the floor. These team members are essentially involved in preparing items to be picked. Photographs A of annexures "**CP-17**" to "**CP-19**" depict a delivery arriving at Lidcombe CFC from a distribution centre with palletised product, a team member using a pallet jack to unload the palletised product and team members unloading the delivery.
20. Other team members (known as personal shoppers) at the Lidcombe CFC are engaged to pick items to fill orders from customers. These team members receive (on a hand held electronic device) the order to be picked, obtain a metal trolley (with a capacity to carry six totes), move to the relevant area to pick and then take ordered items from a shelf and place them inside a tote. These team members pick up to six separate orders at the one time. Photograph A of annexure "**CP-20**" depicts a personal shopper picking and packaging products for home delivery using a trolley which holds six totes. Once all of the items to be picked from a relevant area are obtained, the team member takes the trolley to a staging area.
21. A third group of team members at the Lidcombe CFC then consolidates the picked items from the various areas into a single container for delivery to the customer. These team members place the consolidated order onto a pallet for a delivery truck. Photograph A of

annexures "CP-21" to "CP-22" depicts the staging area for items picked from the chilled zone (including items in customer totes that have been arranged for delivery based on truck route and order number). Photograph A of annexures "CP-23" to "CP-24" depicts the staging area for items picked from the ambient zone (including items in customer totes that have been arranged for delivery based on truck route and order number).

22. A fourth group of team members then move the containers into the back of the delivery truck. Photograph A of annexures "CP-25" and "CP-26" depicts team members consolidating products in the staging area ahead of loading them onto the truck for delivery.

Uber Eats

23. Since 30 August 2021, customers have been able to purchase a limited number of items from a Woolworths Supermarket or a Woolworths Metro store using the Uber Eats website in Australia or the Uber Eats App in Australia.
24. Currently, Woolies X uses a Woolworths Supermarket or a Woolworths Metro Store to fill the order placed on the Uber Eats website or the Uber Eats App. Currently, Woolies X does not use a CFC or an eStore (specialised facilities engaging micro-fulfilment technology to assist online shoppers to pick online orders) to fill the orders placed on the Uber Eats website or the Uber Eats App.
25. Woolies X has set up an e-commerce platform that communicates between the Uber Eats website or Uber Eats App and the relevant Woolworths Supermarket or Woolworths Metro Store.
26. For an order placed using Uber Eats, the process to fill the order involves:
 - (a) First, the order is received electronically by the Woolworths Supermarket or Woolworths Metro Store;
 - (b) Secondly, the order is allocated to a personal shopper in the Woolworths Supermarket or Woolworths Metro Store to pick the items;
 - (c) Thirdly, the personal shopper is directed through a handheld electronic device, to a specific shelf in a specific aisle in the supermarket or store to pick the first item or items;
 - (d) Fourthly, the personal shopper removes the first item or items from the shelf and places it or them into a bag inside a customer tote on the trolley or directly into a bag;
 - (e) Fifthly, the personal shopper is directed to another specific shelf in a specific aisle to pick the second item or items;
 - (f) Sixthly, the personal shopper removes the second item or items from the shelf and places it or them into the bag inside the tote on the trolley or directly into a bag;
 - (g) Seventhly, the personal shopper takes the trolley to the staging area (an area not accessible to the public but adjacent to the supermarket or store);

- (h) Eighthly, a despatch team member takes the tote or bag from the trolley and, to the extent necessary, finalises the packing of the items (including by labelling); and
- (i) Ninthly, when the Uber Eats delivery person arrives at the Supermarket or Metro Store, the despatch team member provides the packed items to the delivery person.

Chullora Supermarket

- 27. Woolworths operates a supermarket at 355 Waterloo Road, Chullora (the "**Chullora Supermarket**"). In the Chullora Supermarket, individual items for sale are placed on shelves in aisles, in fridges, freezers or display cabinets. In most cases, customers attend the store, walk to the relevant shelf, fridge, freezer or display cabinet, select the item(s) for purchase and then walk to a checkout or self-service checkout in the store to purchase the item(s).
- 28. Woolworths also uses the Chullora Supermarket to fill online orders placed in the Chullora region using the Woolworths website or the Woolworths App.
- 29. As at November 2022, the Chullora Supermarket floor is divided into the following zones:
 - (a) Ambient, including:
 - i. Grocery and general merchandise
 - ii. Fruit and Veg
 - iii. Bakery Room
 - (b) Freezer
 - (c) Chiller area, including:
 - i. Butcher Room
 - ii. Delicatessen Room
 - iii. Seafood Room
 - (d) Controlled items
- 30. The grocery and general merchandise area of the Chullora Supermarket in the ambient zone is where individual grocery items and large bulky items (such as toilet paper, paper towels, dog food, nappies, large boxes of cereals and soft drink) are displayed. The items are placed individually on metal shelves. The shelves range from ground level to approximately two meters above ground level. The shelves are divided horizontally into bays and the bays are numbered. The shelves in the bay are also numbered vertically. Photograph "B" of the annexure marked "**CP-1**" depict a photograph of paper towels in the bulky items area of the Chullora Supermarket. Photograph "B" of annexures "**CP-2**" to "**CP-6**" depict other grocery products including dog food, chips, vitamins, shampoo and sugar in the Chullora Supermarket.
- 31. The Fruit and Veg area in the ambient zone of the Chullora Supermarket is used to display fresh fruit and vegetables. The display varies for each product, depending on size and type. For example, some fruits and vegetables are displayed on shelves sitting on top of two

wooden platforms approximately one metre above ground level, whilst other larger fruits or vegetables are displayed in large boxes on the floor. Photograph B of annexure "CP-7" shows watermelons being displayed in one of these boxes in the Chullora Supermarket.

32. The freezer zone of the Chullora Supermarket is used to store frozen items (such as ice cream, frozen vegetables and pies) on freezer shelves (with doors) or in freezer cabinets. The items are placed individually on the shelves in freezers that span the length of the aisle or the cabinets. The shelves range from ground level to approximately two metres above the ground. Photograph B of annexure "CP-8" depicts the shelves in the freezer area (including ice cream stored on the shelves). Photograph B of annexures "CP-9" and "CP-10" depicts the freezer chest in the freezer area (including individual bags of frozen chips and frozen vegetables stored in the cabinets).
33. The chiller zone at the Chullora Supermarket includes aisle 13 as well as separate chilled sections located at the end of the grocery aisles. The chiller zone is used to store cold items (such as juices, cheese, yoghurts, butter and dips). These items are displayed on metal shelves in open fridges that span the length of the aisle or section. The shelves range from close to ground level to approximately two metres above the ground. Open fridges are also used to display some fruit and vegetables in the Fruit and Veg area and some chilled bakery items (such as cakes) in the Bakery section. Fresh milk is also stored in a chilled room at the perimeter of the supermarket floor and is accessed by customers through glass doors. Photograph B of annexures "CP-11" to "CP-13" depict the display of the chiller zone (including individual items of dips, juices and cheese displayed on the shelves).
34. The Delicatessen and Seafood area at the Chullora Supermarket is used to prepare and pack deli items and seafood. These items are displayed in chilled servery cabinets behind glass on the customer-facing side of each room. This area is used to prepare and pack meat. The meat is displayed in chilled servery cabinets on the customer-facing side of the room. This area includes meat cutting tools, including meat slicers. There are a number of fridges and chilled display units within this area that include pre-packaged deli items, seafood and meat. Photograph B of annexure "CP-14" depicts a team member slicing meat using a meat slicer.
35. The Bakery at the Chullora Supermarket is used to prepare and pack breads and similar items. The area includes ovens and bread slicing machines. It also includes trolleys on which finished items are stored. These items are displayed on shelves on the customer-facing side of the area (together with bakery items provided by suppliers). Photograph B of annexure "CP-15" depicts a team member preparing bread in the Bakery.
36. The controlled area is used to store cigarettes and knives. These items are kept on shelves in a secure metal cabinet that is contained in the Customer Service area. For the purposes of picking online orders, the secure zone also includes the BWS store that is adjacent to the Chullora Supermarket. In the BWS store, alcoholic items are displayed individually on metal shelves and in fridges. The area is arranged into a number of aisles. Photograph B of annexure "CP-16" depicts one of the aisles in the BWS store (including wine stored on the shelves).
37. Woolworths engages approximately 151 team members to work in the Chullora Supermarket each week.

38. Some team members at the Chullora Supermarket are used to accept deliveries (usually on a pallet) from a distribution centre, transport the delivery to the relevant area (often using a pallet jack) and place the items forming part of the delivery onto the shelves of the relevant area. These team members are essentially involved in preparing items to be picked directly by customers or by personal shoppers. Photograph B of annexures "CP-17" to "CP-19" depict a delivery arriving from a distribution centre with palletised product, a team member using a pallet jack to unload the palletised product and team members unloading the delivery.
39. Other team members at the Chullora Supermarket (that is, personal shoppers) are used to pick items to fill orders from customers. These team members receive (on a hand held electronic device) the items to be picked and the specific location of these items (aisle, bay and shelf number), obtain a metal trolley (with capacity to carry six customer totes), move to the relevant area to pick and then take ordered items from a shelf and place them inside a customer tote. These team members pick items from up to six separate orders at the one time. Photograph B of annexure "CP-20" depicts a personal shopper picking and packaging products in a trolley with totes and bags. Once all the items to be picked from a relevant area are obtained, the team member takes the trolley to the relevant staging area.
40. A third group of team members at the Chullora Supermarket then consolidates the picked items and arranges the customer totes for direct to boot orders. Photograph B of annexure "CP-21" and "CP-22" shows the chilled room used to stage chilled items (including chilled items in customer totes or shopping bags). Photograph B of annexure "CP-23" to "CP-24" depicts the staging area for items picked from the ambient zone (including items in customer totes that have been arranged for direct-to-boot delivery). Photograph B of annexures "CP-25" and "CP-26" depict team members consolidating products in the staging area and taking the order in a trolley to the customer's car at a designated pick-up spot for the direct-to-boot service.

Signed:



Christopher Peters

Dated:

21/12/22

Annexure CP-1

Photograph A

Photograph B



Photograph A: Paper Towels displayed on shelves at the Lidcombe CFC



Photograph B: Paper Towels displayed on shelves at the Chullora Supermarket

Annexure CP-2

Photograph A



Photograph A: Dog food displayed on shelves at the Lidcombe CFC

Photograph B

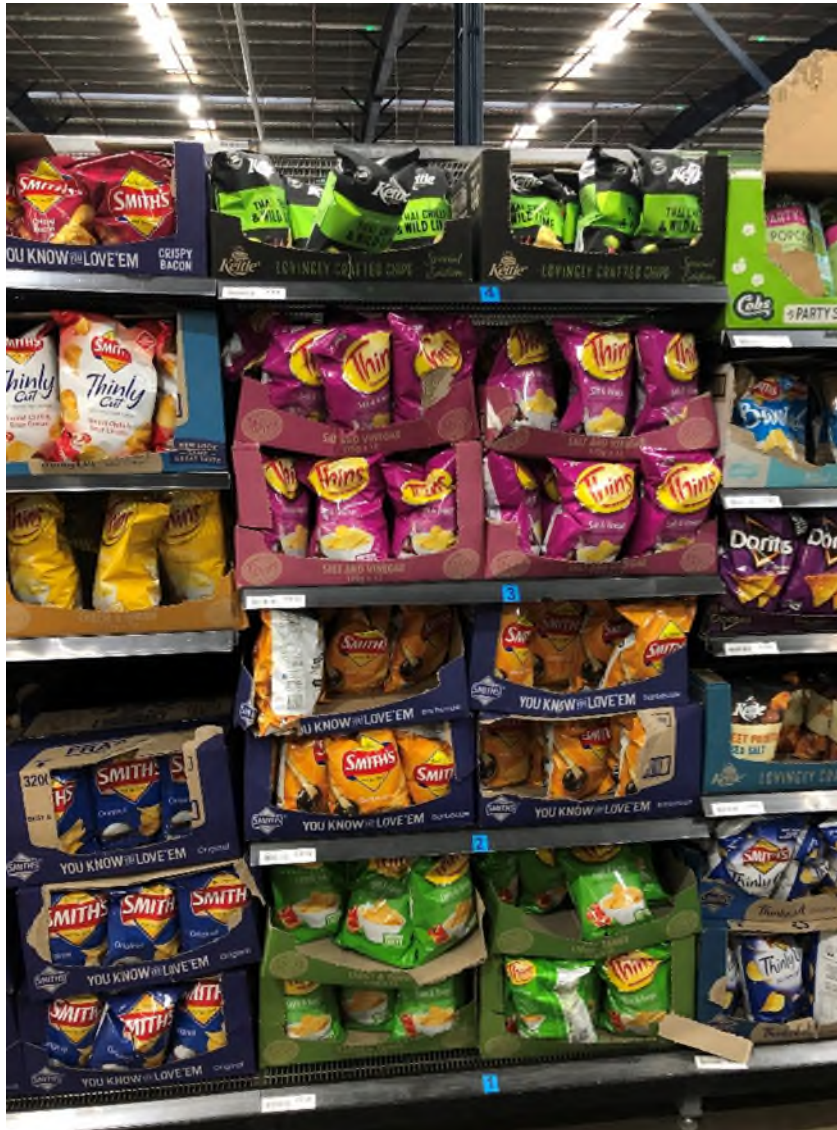


Photograph B: Dog food displayed on shelves at the Chullora Supermarket

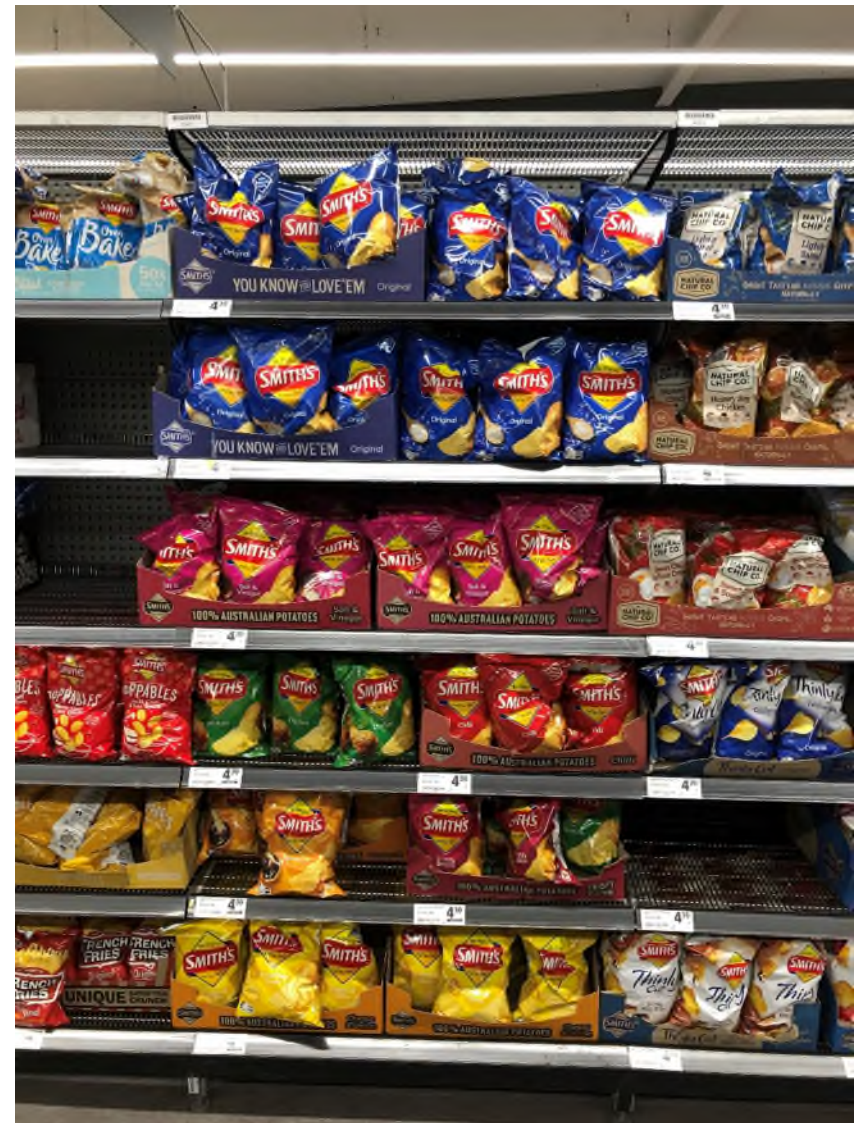
Annexure CP-3

Photograph A

Photograph B



Photograph A: Packets of chips displayed on shelves at the Lidcombe CFC



Photograph B: Packets of chips displayed on shelves at the Chullora Supermarket

Annexure CP-4

Photograph A



Photograph A: Vitamins displayed on shelves at the Lidcombe CFC

Photograph B



Photograph B: Vitamins displayed on shelves at the Chullora Supermarket

Annexure CP-5

Photograph A



Photograph A: Shampoo displayed on shelves at the Lidcombe CFC

Photograph B



Photograph B: Shampoo displayed on shelves at the Chullora Supermarket

Annexure CP-6

Photograph A



Photograph A: Sugar displayed on shelves at the Lidcombe CFC

Photograph B



Photograph B: Sugar displayed on shelves at the Chullora Supermarket

Annexure CP-7

Photograph A



Photograph A: Watermelons displayed in a box in the Temperature Controlled Area at the Lidcombe CFC

Photograph B



Photograph B: Watermelon displayed in a box at the Chullora Supermarket

Annexure CP-8

Photograph A



Photograph A: Ice cream stored on freezer shelves at the Lidcombe CFC

Photograph B



Photograph B: Ice cream stored on freezer shelves at the Chullora Supermarket

Annexure CP-9

Photograph A



Photograph A: Frozen vegetables displayed in a freezer chest at the Lidcombe CFC

Photograph B



Photograph B: Frozen vegetables displayed in a freezer chest at the Chullora Supermarket

Annexure CP-10

Photograph A



Photograph A: Frozen chips displayed in a freezer chest at the Lidcombe CFC

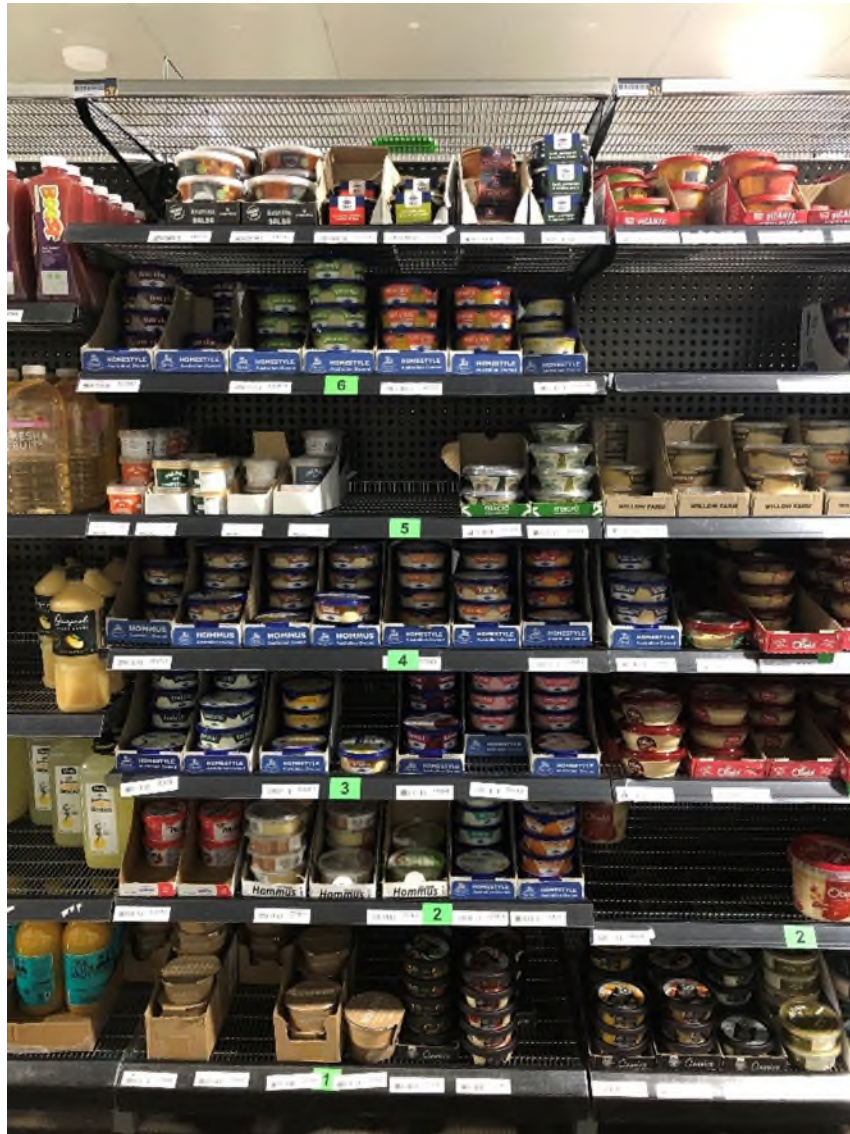
Photograph B



Photograph B: Frozen chips displayed in a freezer chest at the Chullora Supermarket

Annexure CP-11

Photograph A



Photograph A: Dips displayed on shelves in the chiller at the Lidcombe CFC

Photograph B



Photograph B: Dips displayed on shelves in the chiller zone at the Chullora Supermarket

Annexure CP-12

Photograph A



Photograph A: Juice displayed on shelves in the chiller at the Lidcombe CFC

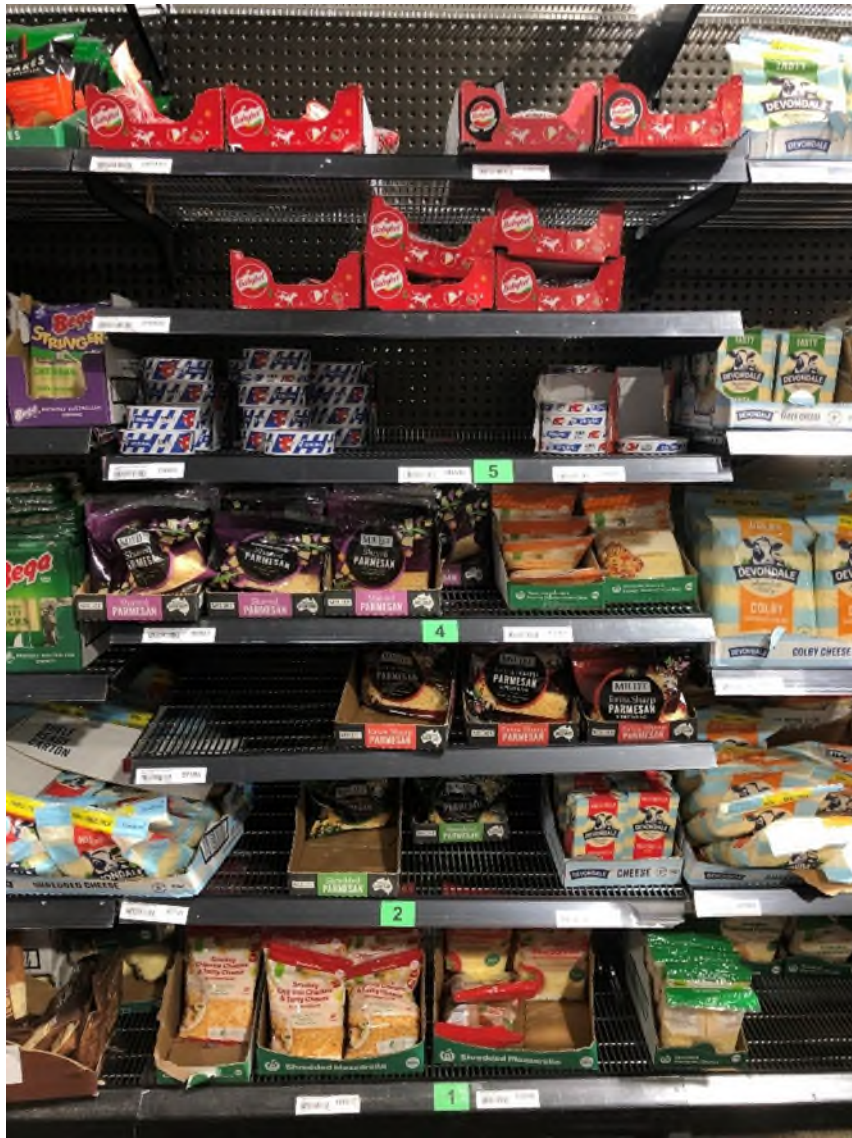
Photograph B



Photograph B: Juice displayed on shelves in the chiller zone at the Chullora Supermarket

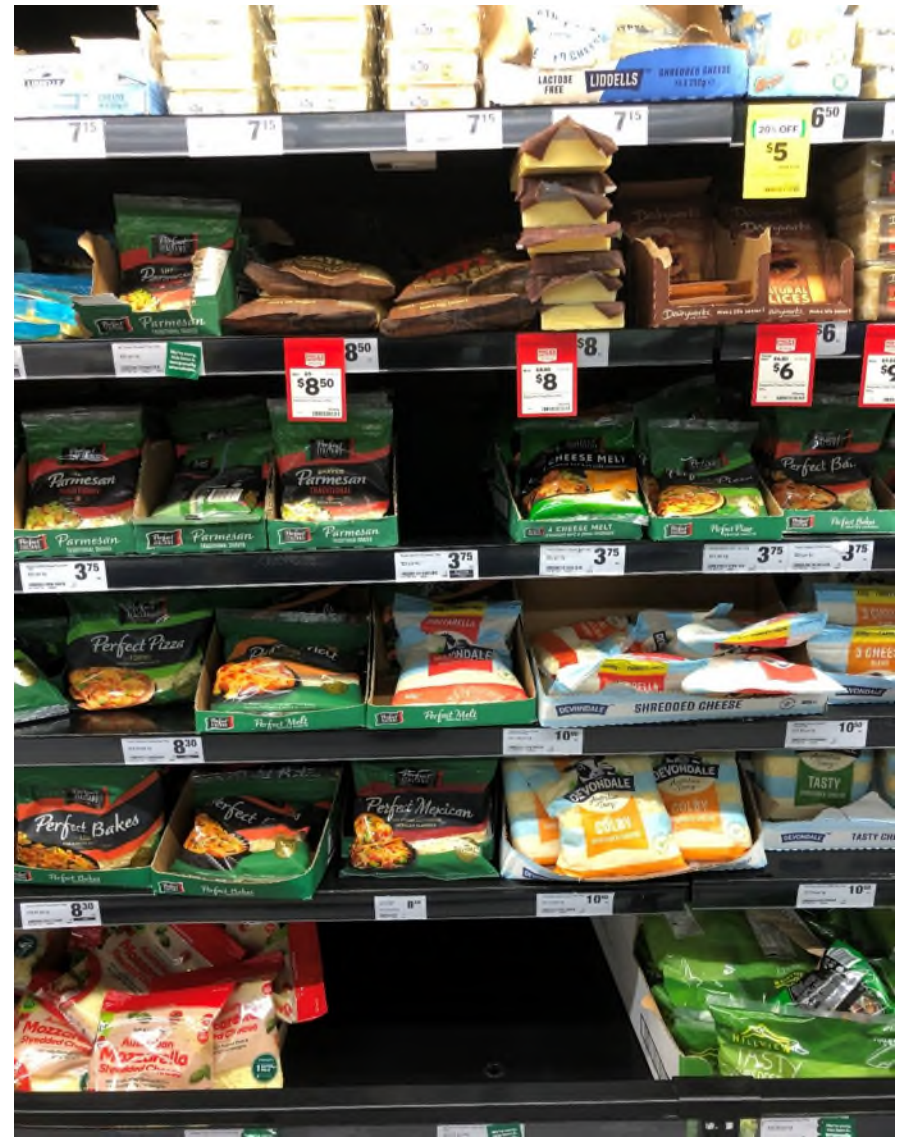
Annexure CP-13

Photograph A



Photograph A: Cheese displayed on shelves in a chiller at the Lidcombe CFC

Photograph B



Photograph B: Cheese displayed on shelves in the chiller zone at the Chullora Supermarket

Annexure CP-14

Photograph A



Photograph A: A deli team member slicing meat using a meat slicer in the Deli and Seafood Room at the Lidcombe CFC

Photograph B



Photograph B: A team member slicing meat using a meat slicer in the Deli and Seafood Area at the Chullora Supermarket

Annexure CP-15

Photographs A



Photograph A: A bakery team member preparing bread products in the Bakery Room at the Lidcombe CFC

Photographs B



Photograph B: A bakery team member preparing bread products in the Bakery at the Chullora Supermarket

Annexure CP-16

Photograph A



Photograph A: One of the aisles in the Controlled Items Area (including wine stored on the shelves)

Photograph B



Photograph B: One of the aisles in the BWS store (including wine stored on the shelves)

Annexure CP-17

Photograph A



Photograph A: A delivery arriving from a distribution centre with a palletised product and a team member using a pallet jack to unload the delivery at the Lidcombe CFC

Photograph B



Photograph B: A delivery arriving from a distribution centre with a palletised product and a team member using a pallet jack to unload the delivery at the Chullora Supermarket

Annexure CP-18

Photograph A



Photograph A: A delivery arriving from a distribution centre with a palletised product and a team member using a pallet jack to unload the delivery at the Lidcombe CFC

Photograph B



Photograph B: A delivery arriving from a distribution centre with a palletised product and a team member using a pallet jack to unload the delivery at the Chullora Supermarket

Annexure CP-19

Photograph A



Photograph A: A delivery arriving from a distribution centre with palletised product and team members unloading the delivery at the Lidcombe CFC

Photograph B



Photograph B: A delivery arriving from a distribution centre with palletised product and team members unloading the delivery at the Chullora Supermarket

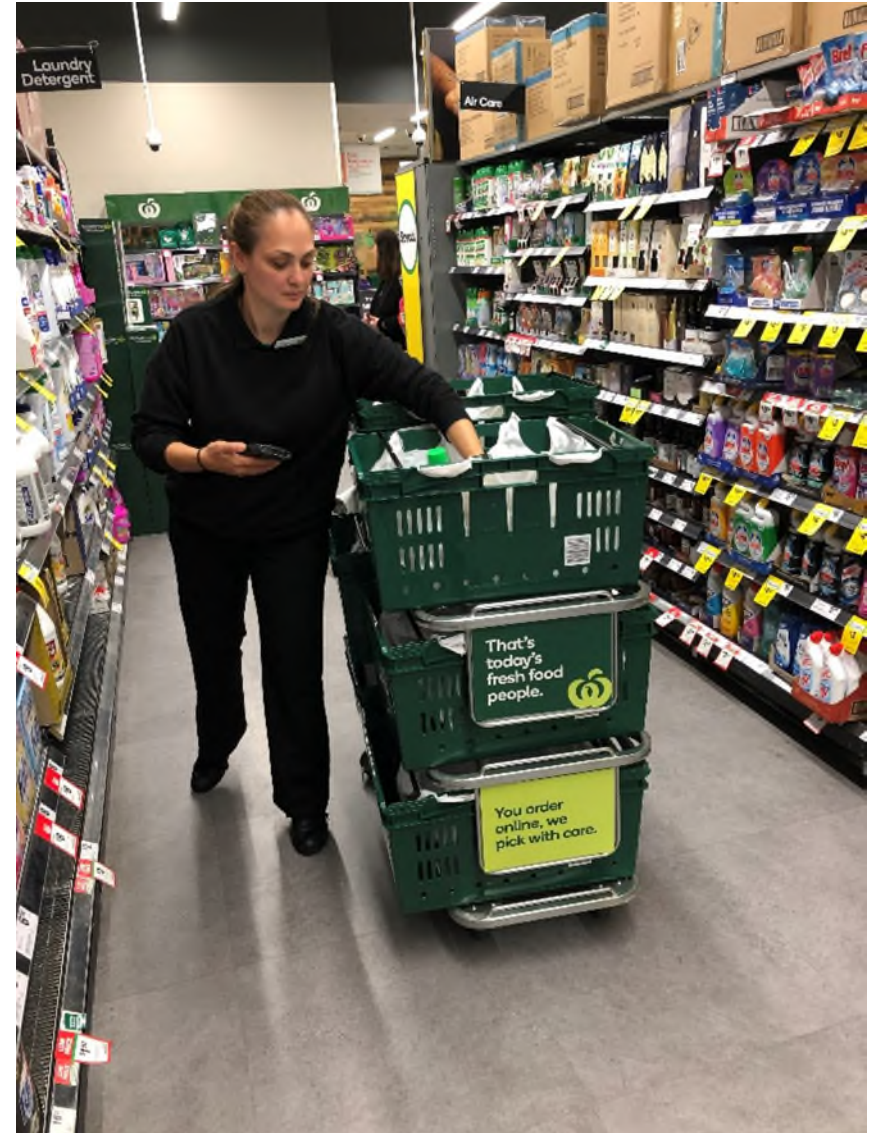
Annexure CP-20

Photograph A



Photograph A: A personal shopper picking and packaging products for home delivery at the Lidcombe CFC

Photograph B



Photograph B: A personal shopper picking and packaging products for the direct-to-boot service at the Chullora Supermarket

Annexure CP-21

Photograph A



Photograph A: The staging area for items picked from the chilled zone at the Lidcombe CFC

Photograph B



Photograph B: The staging area for items picked from the chilled zone at the Chullora Supermarket

Annexure CP-22

Photograph A



Photograph A: The staging area for items picked from the chilled zone at the Lidcombe CFC

Photograph B



Photograph B: The staging area for items picked from the chilled area at the Chullora Supermarket

Annexure CP-23

Photograph A



Photograph A: The staging area for items picked from the ambient zone at the Lidcombe CFC

Photograph B



Photograph B: The staging area for items picked from the ambient zone at the Chullora Supermarket

Annexure CP-24

Photograph A



Photograph A: The staging area for items picked from the ambient zone at the Lidcombe CFC

Photograph B



Photograph B: The staging area for items picked from the ambient zone at the Chullora Supermarket

Annexure CP-25

Photograph A



Photograph A: Team members consolidating products in the staging area for loading onto the truck for delivery at the Lidcombe CFC

Photograph B



Photograph B: Team members consolidating products in the staging area for the direct-to-boot service at the Chullora Supermarket

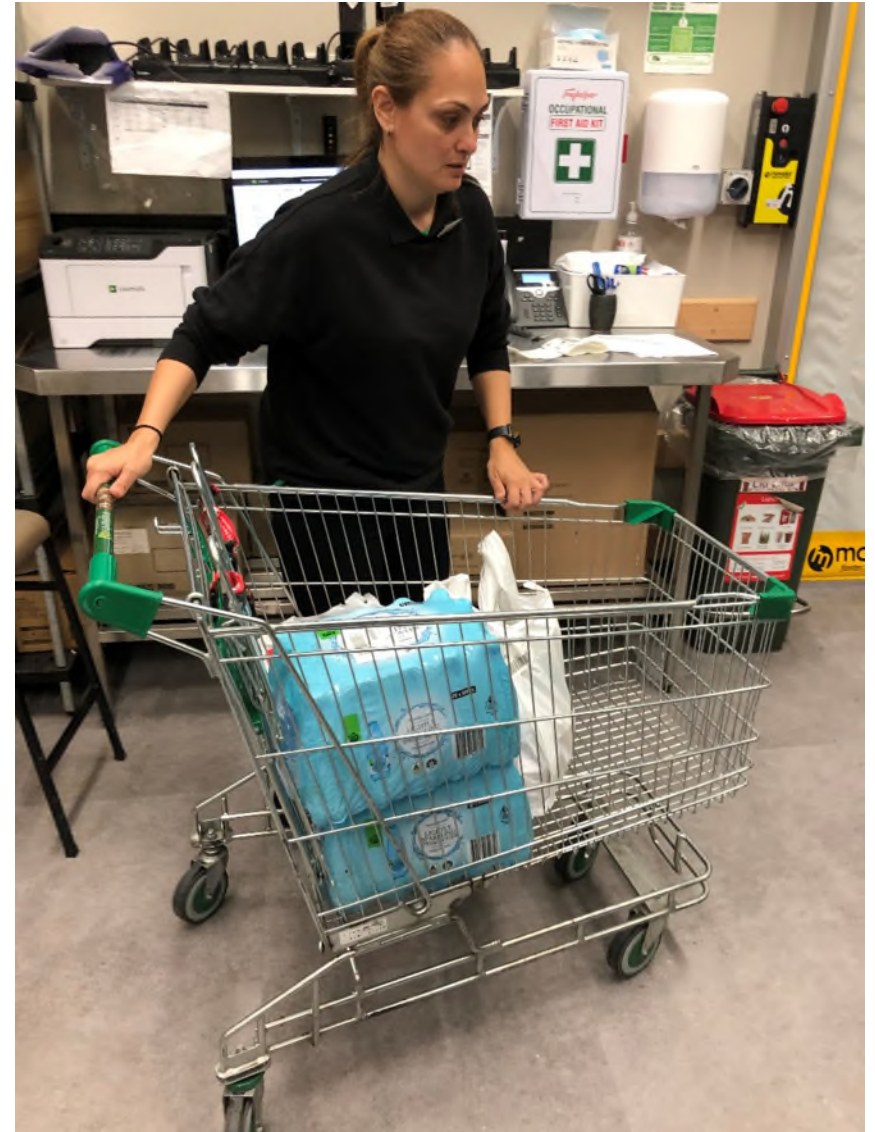
Annexure CP-26

Photograph A



Photograph A: Team members consolidating products in the staging area for loading onto the truck for delivery at the Lidcombe CFC

Photograph B



Photograph B: Team members consolidating products in the staging area for the direct-to-boot service at the Chullora Supermarket

IN THE FAIR WORK COMMISSION

Matter:

Applicant: Woolworths Group Limited

STATEMENT OF THOMAS JAMES LEONARD

I, Thomas James Leonard of 1 Woolworths Way, Bella Vista NSW, 2153 say:

1. I am an employee of Woolworths Group Limited ("**Woolworths**").

Background

2. I am the Head of Smart Growth for Woolworths. I have held this role since 1 November 2021. In this role, I am responsible for identifying and delivering programs of change for our eCom business in order to drive improvements across key customer, team and business metrics.

3. I have been with the Woolworths Group for 6 years. I was previously the Online eCom Project Manager from 2 May 2016 to 1 November 2021.

4. Prior to working for Woolworths I was the Project Program Manager in eCom for Sainsburys.

Sale of Goods and Services

5. Woolworths sells goods and services to customers by four means:

- (a) by the customers attending a store located in a shopping centre or as a stand-alone building;
- (b) by the customers accessing one of two websites (www.woolworths.com.au or www.atwork.woolworths.com.au);
- (c) by the customer accessing an application (the Woolworths App) on a mobile phone, tablet or electronic device; or
- (d) by the customers accessing the Woolworths electronic grocery store at the Uber Eats website (www.ubereats.com/au).

6. The goods sold by Woolworths include fruit and vegetables, meat, seafood, deli items, dairy items, eggs, pantry items, beverages, household items, pet items, baby items and health and beauty items. The services sold by Woolworths include insurance, mobile telephone services, credit card services and debit card services.

Endeavour

7. Woolworths is a related body corporate to Endeavour Group Limited ("**Endeavour**"). Currently, Woolworths has a 14.6 percent shareholding in Endeavour.

8. One division of Endeavour sells alcohol and related goods to customers. Endeavour sells such goods under the “Dan Murphy’s” and “BWS” brands.

Sales in Stores

9. Woolworths sells goods and services in supermarkets (under the “Woolworths” brand) and smaller stores (under the “Woolworths Metro” or “Metro” brand).
10. Currently, Woolworths operates approximately 1,998 Woolworths supermarkets and 91 Metro stores.
11. Currently, Woolworths places individual items for sale on shelves, fridges or in display cabinets in aisles in the stores.
12. Currently, in most cases, customers attend the store, walk to the relevant shelf, fridge or display cabinet, select the item for purchase and then walk to a checkout or self-service checkout in the store to purchase the items.
13. Currently, Woolworths engages team members to:
 - (a) pack items onto or into the shelves, fridges and display cabinets (performed by a “store team member”);
 - (b) scan items at a checkout and handle payments for the items (performed by a “store team member”);
 - (c) supervise self-service checkouts (performed by a “store team member”);
 - (d) bake goods in the bakery section (performed by a "qualified trade baker") and pack the baked goods for sale (performed by a "store team member");
 - (e) prepare deli and seafood items in in-store production areas (performed by a "store team member");
 - (f) pick and pack items in store ordered by customers online or by the Woolworths App (performed by an "online personal shopper"); and
 - (g) collect trolleys and baskets used by customers (performed by a “trolley collector” or a “store team member”).

Home Delivery

14. Currently, in some cases, customers do not attend the store but place an order for home delivery. Customers pay a fee for a Woolworths team member to pick and pack the order at a store and for Woolworths to deliver the order. Customers place an order using a Woolworths website or the Woolworths App or by making a telephone call to a

Customer Hub (a call centre operated by Woolworths). Customers typically pay for the order using a credit card, a debit card or a PayPal account.

15. Currently, Woolworths engages team members (known as “**online personal shoppers**”) to pick and pack items in a store for home delivery. The online personal shoppers receive (on a handheld electronic device) a list of items to be picked. The online personal shoppers walk to the relevant shelf, fridge or display cabinet in the store for the item and pick the item. The online personal shoppers pack the items in delivery bags (unless the customer opts for a bagless delivery) in customer totes. The online personal shoppers then take the packed items in delivery bags to a delivery area in the store. Woolworths then arranges for a delivery driver (sometimes an employee of Woolworths and sometimes a contractor) to deliver the packed items to the customer.
16. Currently, customers that are aged 18 years and above may include the purchase of alcohol in an order for home delivery. Customers place an order using a Woolworths website or the Woolworths App or by making a telephone call to a Customer Hub. The alcohol component of the order is sent electronically to a BWS store adjacent to, or near, the Woolworths store. The alcohol component of the order is picked and packed by an employee of Endeavour and taken to the delivery area in the Woolworths store. The non-alcohol component of the order is picked and packed by a team member of Woolworths and taken to the delivery area in the Woolworths store. Both components of the order are consolidated in the delivery area in the Woolworths store before being delivered by a delivery driver (sometimes a Woolworths team member and sometimes a contractor) to the customer.

Sales Online

17. Woolworths sells goods and services on two Woolworths websites and through one application (the Woolworths App). Woolworths describes the sale of goods and services by the websites and the Woolworths App as “online or eCom sales”.
18. Once an online order is received from a customer, Woolworths has set up a process to follow to pick, pack and deliver the order . Woolworths uses a detailed computer system for part of the process.
19. As the first step, the customer accesses one of the two Woolworths websites or the Woolworths App using a computer, a mobile phone, a tablet or an electronic device.
20. As the second step, the customer logs into their Woolworths account (by entering an email address and a password).
21. As the third step, the customer selects the items to purchase, selects the delivery method and delivery time, and authorises payment for the items (typically by a credit card, a debit card or by use of a PayPal account). The items to purchase may be goods or services sold by Woolworths or goods sold by Endeavour.
22. As the fourth step, the Woolworths computer system determines the postcode and mode of delivery and distributes the order for picking and packing:

- (a) In some metropolitan areas, depending on the postcode of the customer and the mode of delivery (for example, home delivery or "pick up"), the Woolworths computer system sends the customer order to a store (located close to the delivery location) or a customer fulfilment centre (located in the region of the delivery location) or an eStore for picking and packing. I address the nature of a customer fulfilment centre and an eStore later in the statement.
 - (b) In regional and rural areas, the Woolworths computer system sends the customer order to a store (located close to the delivery location) for picking and packing.
23. As the fifth step, Woolworths picks and packs the customer order:
- (a) In some metropolitan areas, where the order is sent to a store for picking and packing, the online personal shoppers in the store receive (on a hand held electronic device) a list of items to be picked, walk to the relevant shelf, fridge or display cabinet in the store for the item, pick the item, pack the item in customer totes and take the packed items to the delivery area in the store.
 - (b) In some metropolitan areas, where the order is sent to an eStore for picking and packing, the automation technology in the eStore receives a list of items to be picked and moves the items to be picked from storage via a conveyor belt to the relevant 'Goods To Person unit' in the eStore. The items are then picked by team members into customer totes and transported to the delivery area in the eStore. (This process is used for approximately 80% of items which are picked and packed in an eStore. The remaining 20% of items are picked and packed manually by online personal shoppers on the 'shop floor' of the eStore).
 - (c) In some metropolitan areas, where the order is sent to a customer fulfilment centre, the team members who are pickers in the customer fulfilment centre (the online personal shoppers) receive (on a hand held electronic device) a list of items to be picked, walk to the relevant shelf, fridge or display cabinet in the facility for the item, pick the item, pack the item in customer totes and take the packed items to the delivery area.
 - (d) In regional and rural areas, the online personal shoppers in the store receive (on a hand held electronic device) a list of items to be picked, walk to the relevant shelf, fridge or display cabinet in the store for the item, pick the item, pack the item in customer totes and take the packed items to the delivery area in the store.
24. As the sixth step, Woolworths delivers the packed items or arranges for the packed items to be collected:
- (a) In some cases, where the items were picked and packed at a store, Woolworths arranges for the delivery (either by a Woolworths team member, delivery partner or a contractor) of the packed items to the customer.
 - (b) In some cases, where the items were picked and packed at a store or an eStore, the customer collects the packed items from the store ("pick up") or a car park adjacent

to or near the store or the eStore (“direct to boot”). In such cases, a Woolworths team member takes the packed items to the customer at a pick-up point at the store (for “pick up”) or takes the packed items to the customer in the carpark (for “direct to boot”).

(c) In some cases, where the items were picked and packed at an eStore or a customer fulfilment centre, Woolworths arranges for a contractor to deliver the packed items to the customer.

25. A customer fulfilment centre is laid out similarly to a Woolworths supermarket and is used to fill online or telephone orders placed by customers of Woolworths. Woolworths currently operates seven customer fulfilment centres across Australia.

26. An eStore is a building which incorporates a Woolworths Supermarket and an eCom floor which functions as a large online section of the supermarket store with increased automation functionality. The eCom floor comprises of three main areas including an automated Order Storage Retrieval system, a consolidation and merge area and a despatch area.

Sales on Uber Eats Website

27. Woolworths sells goods (particularly curated food items) at an electronic grocery store at the Uber Eats website.

28. Currently, customers place an order on the Uber Eats website. Customers select the items to purchase, select the delivery method and delivery time, and authorise payment for the items (typically by a credit card, a debit card or by use of a PayPal account). The order is sent to the Woolworths store (located close to the delivery location) and picked and packed by an online personal shopper in the Woolworths store. The online personal shopper takes the packed items to the collection area for collection by an Uber Eats driver or rider. The Uber Eats driver or rider delivers the packed items to the customer.

29. Customers are not able to purchase alcoholic items as part of an order placed with Woolworths through the Uber Eats website.

30. Uber Eats has set terms and conditions for the placing of customer orders through the Uber Eats website, which apply to Woolworths orders placed through this platform.

Signed:

Tom Leonard

Thomas James Leonard

Dated:

21/12/2022
