



THE UNION FOR WORKERS IN
RETAIL, FAST FOOD, WAREHOUSING.

The Shop, Distributive and Allied Employees' Association

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NATIONAL PRESIDENT

Michael Donovan

NATIONAL SECRETARY

Gerard Dwyer

6 December 2018

Fair Work Commission
11 Exhibition Street
MELBOURNE VIC 3000
By email: amod@fwc.gov.au

Dear AMOD,

**RE: 4 yearly review of modern awards – plain language re-drafting –
facilitative provisions altering spread of hours (AM2016/15)**

In amended directions issued on 27 November 2018, the parties are invited to make submissions in relation to the span of hours issue. The SDA has made submissions on this matter as it affects the Storage Services and Wholesale Award 2010.

The SDA does not intend to make further submissions on this matter and instead relies on its previous submissions (see *Submission in response to the storage Services and Wholesale Award Exposure Draft*, dated 28 January 2015 and *Submissions on technical and drafting issues related to the Storage Services and Wholesale Award Exposure Draft and outline of submissions on substantive claims*, dated 15 July 2015).

The summary of submissions referred to in the statement issued on 13 November 2018 at paragraph 5 accurately summarises the SDA's position. Namely, the facilitative provision permits that the spread of hours can be altered at one or other end of the day, but not both.

Yours Sincerely,

A handwritten signature in cursive script, appearing to read 'Gerard Dwyer'.

GERARD DWYER
National Secretary