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Dear Penny

Bakers Delight Holdings Ltd – Application for Urgent Interim and Final Authorisation of Cartel Conduct (Non-Merger)

1. We act on behalf of Bakers Delight Holdings Ltd (“**BDH**”).
2. BDH is notifying the Australian Competition & Consumer Commission (“**the Commission**”) of its intention to apply for an urgent interim and final authorisation to engage in cartel conduct.

Proposed conduct

Overview

3. The proposed conduct is essentially a vertical arrangement by BDH (a franchisor but not a supplier of goods for resupply) to implement an innovative and more efficient point of sale (“**POS**”) system in 509 retail bakeries (504 owned by franchisees and 5 owned by BDH).
4. The degree of inter-brand competition affected by the proposed conduct (that is, the extent to which the proposed conduct is horizontal) is negligible.
5. One of the efficiencies of the proposed POS system is that it would replace the existing promotional discounts with a set of tiered discounts, initially reflecting existing pricing patterns. The proposed POS system, with its tiered promotional discounts, would reduce retailers’ transaction costs in applying a promotional discount at POS. In that way only is the proposed conduct more restrictive of retailers in their choices of promotional discounts for certain bundles of products.
6. Significantly, retailers would retain complete freedom to set their own prices on individual products. The proposed POS system does not limit that freedom in any respect.
7. The tiered promotional discounts available under the proposed POS system would be selected by BDH (and not the retailers) in response to intense inter-brand competition. Essentially, the proposed POS system is a more efficient means by which retailers can

select from and implement retail discounts recommended or mandated by the franchisor.

8. The proposed POS system will increase inter-brand competition by improving productive efficiency and reducing transaction costs for retailers to provide recommended discounts to consumers. The Baker's Delight brand has a market share of about 9.3% in a highly competitive market dominated by Woolworths and Coles.
9. The implementation of the tiered system of discounts is inherent to the increased efficiency of the brand's POS system. Implementing the proposed POS without the tiered system of promotional discounts would greatly increase its costs of implementation and operation.

Promotion Discounts

10. A range of BDH Products are sold via Promotion Discounts. Promotion Discounts are a set of rules that get evaluated against a customer's shopping cart in the BDH point of sale system when a customer transaction is processed in a Bakers Delight Bakery or on the e-commerce platform ("**Shopping Cart**"). These rules determine if the Shopping Cart qualifies for a discount. Promotion Discounts can apply to multiple BDH Products of the same type, known as Value Packs or it can apply to specific combinations of BDH Products, known as Combos. BDH determines the BDH Products that make up the Value Packs and Combos and the set of rules ("**Promotion Discount Rules**") that apply to allow for sale of the Value Packs and Combos at a discounted price. The Promotion Discount Rules follow a format such as "if the Shopping Cart contains **X** of a particular BDH Product AND/OR **Y** of another BDH Product then the discounted price for these items is **\$Z**". If the Promotion Discount Rule evaluates successfully in the point of sale system then the price of the individual products is replaced by the discounted price.
11. The Promotion Discount Rules are evaluated and applied by the current BDH point of sale system based on the BDH Products added to the Shopping Cart on the point of sale system when a customer transaction is processed in a Bakers Delight Bakery or on the e-commerce platform.
12. The Promotion Discount Rules are evaluated each time a BDH Product is added to the Shopping Cart and the Promotion Discount will automatically apply when the Promotion Discount Rules are satisfied. For example, a customer may add five hot cross buns to the Shopping Cart but the discounted price for a six hot cross bun Promotion Discount will only be triggered if a sixth hot cross bun is added to the Shopping Cart.
13. Promotion Discounts are not physical products but rather a rule that needs to be evaluated to see if the discount applies.
14. BDH specifies a Recommended Retail Price ("**RRP**") for BDH Products, including Promotion Discount. Franchisees are not restricted to sell BDH Products, including Promotion Discount at the RRP that is recommended by BDH.
15. In the current point of sale system if a Bakers Delight Bakery wishes to deviate the price from the RRP, then that Bakery will create a specific pricing record for the BDH Product it wishes to deviate. The Bakers Delight Bakery can set this price at whatever value they wish. This specific pricing record will only apply to the individual Bakers Delight Bakery. When that BDH Product is added to the Shopping Cart by the customer at the Bakers Delight Bakery the pricing engine will display the specific price for that product for that Bakers Delight Bakery. Specific pricing is also available online as soon as a customer selects their Bakers Delight Bakery.
16. The Proposed Conduct the subject of this application comprises:
 - (a) BDH and Franchisees using a new point of sale system ("**the POS system**") that limits pricing for each Promotion Discount that Bakers Delight Bakeries choose to

sell to five price tiers. One price tier is the RRP, one price tier is below the RRP and the remaining three are above the RRP.

- (b) In setting these price tiers BDH will provide price tiers that align to the current observed pattern of price deviation for Promotion Discounts in the Bakers Delight Network. The price tiers will be standard price increments from the RRP. Larger increments apply where the RRP for a product is higher. For example, if the RRP is \$10.00 then the price increments may be set at \$1.00 increments below and above the RRP, and for a product with a RRP of \$4.00 the price increments may be \$0.25 below and above the RRP.
- (c) Bakers Delight Bakeries can only deviate to any of these pre-configured price tiers for a Promotion Discount. This will create a fixed range of Promotion Discounts. To reiterate, however, it would not affect their freedom to set their own prices for individual products, including setting their own discounts for such products.
- (d) BDH and its Franchisees are party to franchise agreements and operate Bakers Delight Bakeries. BDH owns and operates a small number of Company Bakeries which compete with Franchised Bakeries located in close proximity to the Company Bakeries. Accordingly, these Franchised Bakeries and Company Bakeries are or are likely to be in competition with each other, albeit in a very limited way.

("the Proposed Conduct").

- 17. The Proposed Conduct will not impact prices of any other BDH Products, only Promotion Discounts.
- 18. BDH submits that the benefits of the Proposed Conduct will outweigh any possible detriment arising from the Proposed Conduct and is not expected to result in any measurable detriments to the public.
- 19. The Proposed Conduct may be construed as being cartel conduct within the meaning of sections 45AD(2) and (4) of the *Competition and Consumer Act 2010* (Cth) (**CCA**), based on an arrangement or understanding that is likely to have the effect, of directly or indirectly, fixing, controlling or maintaining the price of or providing for the fixing, controlling or maintaining of the price in relation to goods supplied or likely to be supplied, by any or all of the parties to the arrangement or understanding under.

Submission of application

- 20. BDH seeks to make an application for the authorisation to engage in the Proposed Conduct pursuant to section 88(1) CCA and an application for an urgent interim authorisation under section 91(2)(d) CCA.
- 21. Included in this application are the following documents for submission:
 - (a) Non-confidential copy of Application for Final Authorisation (Non-Merger) – to be made available on the public register ("**Public Application**"); and
 - (b) Confidential copy of Application for Final Authorisation (Non-Merger) – to be excluded from the public register ("**Confidential Application**").

Request for urgent interim authorisation

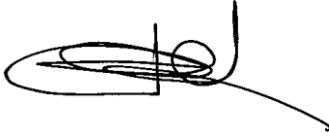
- 22. BDH seeks an interim authorisation to be considered shortly after lodgement of this application under section 91(2)(d) of the CCA.

23. BDH is in the process of negotiating the contract for the new POS system, and implementation of the new POS system is anticipated to take place in October 2023.
24. BDH and current Franchisees will be expected to engage in Proposed Conduct from the implementation date of the new POS system.
25. The new POS system should be implemented as soon as practicable so that BDH and its Franchisees can take advantage of the upgrades to the POS functionality and remain competitive.
26. The current contract for the existing POS solution used by BDH expires in April 2024 and BDH is looking to move to the new POS solution well ahead of this deadline to avoid the need to renew the current contract for an additional two years, which will be a multi-million dollar expense to BDH.
27. Sufficient time is required to transition to the new POS solution as:
 - (a) the transition to the new POS system takes several months to execute, as all Australian and Canadian bakeries must be transitioned to the new system. The transition will affect over 700 bakeries in the global franchise system;
 - (b) there are blackout periods whereby BDH is unable to progress the transition, namely during the Christmas period and for the period of the Canadian franchise network bread conference which is to be attended by representatives of BDH and the Franchisees of the Canadian bakeries; and
 - (c) there will be significant licensing costs associated with failure to complete the transition before April 2024. BDH provides IT services to Franchisees at cost, so BDH will pass on the increased costs to Franchisees, which may then be passed on to consumers by way of increases in product prices;
 - (d) the new POS system requires sufficient expertise and knowledge to implement and install. The new POS system vendor is ready and able to commence the transition of the systems, so if the implementation is delayed then there is a risk of losing key staff who are currently on standby to commence the transition. Loss of such staff and expertise will further add to costs which will be passed on to Franchisees, and in turn consumers by way of increases in product prices; and
 - (e) there is a significant opportunity cost associated with not transitioning to the new POS system. The new POS System is a superior system to the current system with additional features and improvements including integrated payment gateway, more secure payment options, better layout and user interface and more customer support from the supplier. This will provide greater efficiencies in serving customers and processing transactions, and will make BDH more competitive.
28. There will be little impact on Franchisees if the interim authorisation is granted because there are limited restrictions to Franchised Bakeries that will be imposed under the new POS system. The Proposed Conduct is unlikely to affect the current pricing strategy of Bakers Delight Bakeries. Therefore, the Proposed Conduct will have little impact on the existing degree of competition in the retail bread market.

Please contact the writer if the Commission would like any further information.

Thank you for your assistance.

Yours Sincerely

A handwritten signature in black ink, appearing to be 'Raynia Theodore', with a long horizontal stroke extending to the right.

Raynia Theodore

Principal

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Encl

Application for Urgent Interim and Final Authorisation (Non- Merger)

Lodged by Bakers Delight Holdings Ltd

Bakers Delight

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Schedule 6 Roy Morgan Single Source Australia, January – December 2022

PARTIES TO THE PROPOSED CONDUCT

1. APPLICANTS FOR AUTHORISATION

1.1	Name	Bakers Delight Holdings Ltd ("BDH")
	Registered Office	Level 1, 293 Camberwell Road, Camberwell, Victoria, 3124
	Telephone number	(03) 9811 6111
	ACN	052 528 202
1.2	Contact person's name	Raynia Theodore
	Position	Principal Lawyer MST Lawyers
	Telephone number	(03) 8540 0242
	Email address	raynia.theodore@mst.com.au
1.3	Description of business activities	<p>Bakers Delight is a franchisor that owns all the intellectual property relating to the conduct of Bakers Delight retail bakery businesses throughout Australia. Bakers Delight grants franchises for the operation of retail bakeries ("Franchised Bakeries") and itself owns and operates a small number of retail bakeries ("Company Bakeries") under the "Bakers Delight" name and logo (together known as "Bakers Delight Bakeries"). Bakers Delight Franchisees ("Franchisees") are required to operate Franchised Bakeries in accordance with the comprehensive bakery systems, methods, procedures and controls specified by Bakers Delight for the production and retail sale of fresh baked bread, bread based products and pastry based products developed by Bakers Delight ("the System"). Compliance with the System is essential to protect the integrity of the Bakers Delight Franchise Network ("the Bakers Delight Network") and brand and to ensure high quality products and services are supplied by Bakers Delight Bakeries to consumers. In Australia as at the date of this Notification there are 509 Bakers Delight Bakeries, 504 of which are Franchised Bakeries and the other 5 are Company Bakeries.</p>
1.4	Email address for service of documents in Australia	raynia.theodore@mst.com.au

2. DETAILS OF OTHER PERSONS/CLASSES OF PERSONS WHO ALSO PROPOSE TO ENGAGE IN THE PROPOSED CONDUCT, AND ON WHOSE BEHALF AUTHORISATION IS SOUGHT

BDH is the Applicant. The Proposed Conduct will impact BDH and current Franchisees and future Franchisees of BDH. Franchisee details as at the date of this Application are provided in Schedule 1 of this Application.

BDH's Related Entities and Associates will not engage in the Proposed Conduct, and authorisation is not sought on their behalf.

THE PROPOSED CONDUCT

3. DETAILS OF THE PROPOSED CONDUCT

3.1 Description of the Proposed Conduct

Background

BDH is a family-owned Australian company which began trading in 1980. It sells a variety of fresh bread, bread based products and pastry based products which are baked daily instore and a limited range of other finished products purchased from third party suppliers ("BDH Products"). The Bakers Delight Network has since expanded, with bakeries operating in New Zealand (under a Master Franchisee since July 2022), Canada and the USA.

The Bakers Delight Network comprises mainly Franchised Bakeries. As at the date of this Application there are 5 Company Bakeries and 504 Franchised Bakeries across all States and Territories in Australia (except the Northern Territory).

BDH Products are sold in store from Bakers Delight Bakeries and a limited range is also available for purchase online.

Proposed Conduct

Overview

Put succinctly, the proposed conduct is essentially a vertical arrangement by BDH (a franchisor but not a supplier of goods for resupply) to implement an innovative and more efficient point of sale (**POS**) system in 509 retail bakeries (504 owned by franchisees and 5 owned by BDH).

The degree of inter-brand competition affected by the proposed conduct (that is, the extent to which the proposed conduct is horizontal) is negligible.

One of the efficiencies of the proposed POS system is that it would replace the existing promotional discounts with a set of tiered discounts, initially reflecting existing pricing patterns. The proposed POS system, with its tiered promotional discounts, would reduce retailers' transaction costs in applying a promotional discount at POS. In that way only is the proposed conduct more restrictive of retailers in their choices of promotional discounts for certain bundles of products.

Significantly, retailers would retain complete freedom to set their own prices on individual products. The proposed POS system does not limit that freedom in any respect.

The tiered promotional discounts available under the proposed POS system would be selected by BDH (and not the retailers) in response to intense inter-brand competition. Essentially, the proposed POS system is a more efficient means by

which retailers can select from and implement retail discounts recommended or mandated by the franchisor.

The proposed POS system will increase inter-brand competition by improving productive efficiency and reducing transaction costs for retailers to provide recommended discounts to consumers. The Baker's Delight brand has a market share of about 9.3% in a highly competitive market dominated by Woolworths and Coles.

The implementation of the tiered system of discounts is inherent to the increased efficiency of the brand's POS system. Implementing the proposed POS without the tiered system of promotional discounts would greatly increase its costs of implementation and operation.

Promotion Discounts

- (a) A range of BDH Products are sold via Promotion Discounts. Promotion Discounts are a set of rules that get evaluated against a customer's shopping cart in the BDH point of sale system when a customer transaction is processed in a Bakers Delight Bakery or on the e-commerce platform ("Shopping Cart"). These rules determine if the Shopping Cart qualifies for a discount. Promotion Discounts can apply to multiple BDH Products of the same type, known as Value Packs or it can apply to specific combinations of BDH Products, known as Combos. BDH determines the BDH Products that make up the Value Packs and Combos and the set of rules ("Promotion Discount Rules") that apply to allow for sale of the Value Packs and Combos at a discounted price. The Promotion Discount Rules follow a format such as "if the Shopping Cart contains **X** of a particular BDH Product AND/OR **Y** of another BDH Product then the discounted price for these items is **\$Z**". If the Promotion Discount Rule evaluates successfully in the point of sale system then the price of the individual products is replaced by the discounted price.
- (i) Promotion Discounts are not physical products but rather a rule that needs to be evaluated to see if the discount applies.
 - (ii) Many Promotion Discounts are seasonal and available only during select times of the year. BDH typically runs 12 major marketing campaigns each year and different Promotion Discounts apply to support these campaigns.
 - (iii) Promotion Discounts account for approximately **[CONFIDENTIAL]**% of total sales for an average Bakers Delight Bakery. Approximately **[CONFIDENTIAL]**% of the Promotion Discounts are mandatory and must be sold by Bakers Delight Bakeries. For the remaining **[CONFIDENTIAL]**%, BDH and Franchisees can choose which Promotion Discounts to offer for sale in their Bakers Delight Bakery.
- (b) A list of all current Promotion Discounts is contained at Schedule 3 to this Application. Examples of Promotion Discounts as at the date of this Application are:
- (i) six hot cross buns, where the price for the six hot cross buns is **\$9.00**, rather than the price of six individual hot cross buns, which is **\$11.40** (6 x \$1.90) based on the current recommended retail price.

- (ii) one Hi-Lo loaf and six white buns where the price for this combination of BDH Products is **\$9.00** rather than the price of one Hi-Lo loaf (**\$5.20**) plus the price of six white buns (**\$4.90**) for a total of **\$10.10**.
- (c) The Promotion Discount Rules are evaluated and applied by the current BDH point of sale system based on the BDH Products added to the Shopping Cart on the point of sale system when a customer transaction is processed in a Bakers Delight Bakery or on the e-commerce platform.
- (d) The Promotion Discount Rules are evaluated each time a BDH Product is added to the Shopping Cart and the Promotion Discount will automatically apply when the Promotion Discount Rules are satisfied. For example, a customer may add five hot cross buns to the Shopping Cart but the discounted price for a six hot cross bun Promotion Discount will only be triggered if a sixth hot cross bun is added to the Shopping Cart.

Pricing of BDH Products and the ability for Franchisees to change the pricing

- (e) BDH specifies a Recommended Retail Price (“RRP”) for BDH Products, including Promotion Discounts. Franchisees are not restricted to sell BDH Products, including Promotion Discounts at the RRP that is recommended by BDH.
- (f) In the current point of sale system if a Bakers Delight Bakery wishes to deviate the price from the RRP, then that bakery will create a specific pricing record for the BDH Product it wishes to deviate. The Bakers Delight Bakery can set this price at whatever value they wish. This specific pricing record will only apply to the individual Bakers Delight Bakery. When that BDH Product is added to the Shopping Cart by the customer at the Bakers Delight Bakery the pricing engine will display the specific price for that product for that Bakers Delight Bakery. Specific pricing is also available online as soon as a customer selects their Bakers Delight Bakery.
- (g) Within the current point of sale system the Bakers Delight Bakery can also deviate the Promotion Discount price. The Bakers Delight Bakery can set this price at whatever value they wish. This specific pricing record will only apply to the individual Bakers Delight Bakery. When that BDH Product is added to the Shopping Cart by the customer at the Bakers Delight Bakery the pricing engine will display that bakery’s specific price for that product.

Proposed Conduct due to new point of sale system

- (h) The Proposed Conduct the subject of this Application comprises:
 - (i) BDH and Franchisees using a new point of sale system (“the POS system”) that limits pricing for each Promotion Discount that Bakers Delight Bakeries choose to sell to five price tiers. One price tier is the RRP, one price tier is below the RRP and the remaining three are above the RRP.
 - (ii) In setting these price tiers BDH will provide price tiers that align to the current observed pattern of price deviation for Promotion Discounts in the Bakers Delight Network. The price tiers will be standard price increments from the RRP. Larger increments apply where the RRP for a product is higher. For example, if the RRP is \$10.00 then the price increments may be set at \$1.00 increments below and above the RRP,

and for a product with a RRP of \$4.00 the price increments may be \$0.25 below and above the RRP.

- (iii) Bakers Delight Bakeries can only deviate to any of these pre-configured price tiers for a Promotion Discount. This will create a fixed range of Promotion Discounts. To reiterate, however, it would not affect their freedom to set their own prices for individual products, including setting their own discounts for such products.
- (iv) BDH and its Franchisees are party to franchise agreements and operate Bakers Delight Bakeries. BDH owns and operates a small number of Company Bakeries which compete with Franchised Bakeries located in close proximity to the Company Bakeries. Accordingly, these Franchised Bakeries and Company Bakeries are or are likely to be in competition with each other, albeit in a very limited way.

("the Proposed Conduct").

- (i) The Proposed Conduct will not impact prices of BDH Products, only Promotion Discounts. The complete list of BDH Products is contained at Schedule 2 to this Application.

Application

BDH seeks to make an application for the authorisation to engage in the Proposed Conduct pursuant to section 88(1) *Competition and Consumer Act 2010* (Cth) ("CCA") and an application for an urgent interim authorisation under section 91(2)(d) CCA.

3.2 Relevant provisions of the *Competition and Consumer Act 2010* (Cth) which might apply to the Proposed Conduct

BDH seeks authorisation to engage in the Proposed Conduct potentially being cartel conduct within the meaning of sections 45AD(2) and (4) of the CCA based on an arrangement or understanding that is likely to have the effect, of directly or indirectly, fixing, controlling or maintaining the price of or providing for the fixing, controlling or maintaining of the price in relation to goods supplied or likely to be supplied, by any or all of the parties to the arrangement or understanding under.

BDH does not seek authorisation under section 48 of the CCA as BDH does not supply goods or services to Franchisees for sale to consumers and accordingly does not engage in Resale Price Maintenance.

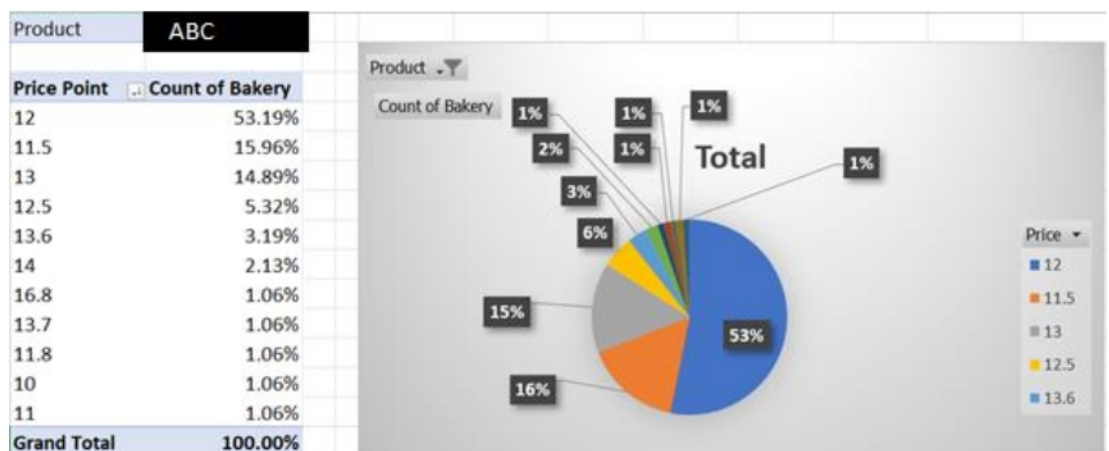
3.3 Rationale for the Proposed Conduct

- (a) All sales in the Bakers Delight Network by both Company Bakeries and Franchised Bakeries are recorded through a centralised POS system.
- (b) The Proposed Conduct arises due to the proposed introduction of a new point of sale system for the Bakers Delight Network which BDH proposes to implement in around October 2023. Users of the POS system, including BDH for Company Bakeries and Franchisees for Franchised Bakeries, will be required to implement the POS system.
- (c) The implementation of the POS system will, in respect of Promotion Discounts, involve:

- (i) at the time of installation or set up of the POS system, BDH for Company Bakeries and Franchisees for Franchised Bakeries will select a price tier for each Promotion Discount that is to be ranged in their Bakers Delight Bakeries. This sets the price tier for their Bakers Delight Bakery in the POS system. BDH for Company Bakeries and Franchisees for Franchised Bakeries will be able to independently change their selection of price tier at any time without assistance from BDH. The selection of the price tier will be instantaneously reflected in the POS system of that Bakers Delight Bakery;
 - (ii) significantly, prices for BDH Products that are not Promotion Discounts (“Individual Products”) will be inputted at RRP. Franchised Bakeries (and the 5 Company Bakeries) can independently make changes to the prices of Individual Products without assistance from BDH at any time;
 - (iii) when a customer adds BDH Products to their Shopping Cart in the POS system that triggers the Promotion Discount Rule and the price tier selected by the Bakers Delight Bakery for the Promotion Discount is automatically applied to the order.
- (d) The POS system has limitations in its handling of price deviations for Promotion Discounts.
- (i) This limitation does not affect Individual Products, as they are administered in a different way to Promotion Discounts. Promotion Discounts are not Products, rather, a set of rules that apply to a grouping of BDH Products. The data structure for the pricing of Individual Products and Promotion Discounts is different in the POS system. Both BDH and Franchisees will retain the ability to deviate the pricing of Individual Products.
 - (ii) A new Promotion Discount Rule needs to be created in the POS system for each price deviation which BDH or a Franchisee may want to select (“Promotion Discount Record”). Therefore, for each Promotion Discount a set of five (corresponding to each tier) Promotion Discount Records must be separately set up in the POS system. The price is defined within the Promotion Discount Record. As the Promotion Discount is essentially a rule, each rule must also be tested to ensure that it works correctly in the POS system.
 - (iii) The POS system does not allow for individual Bakers Delight Bakeries to interact or modify either the BDH Products to which a Promotion Discount applies or the price of the Promotion Discount.
 - (iv) This differs from the current point of sale system which allows BDH and Franchisees to set the price of a Promotion Discount.
- (e) With the new POS system it is not practical to create separate Promotion Discount Records on the POS system to allow BDH and Franchisees the unrestricted ability to deviate pricing for the following reasons:
- (i) Based on data extrapolated from the current point of sale system, there are on average 36 deviations from the RRP per Promotion Discount, with the highest recorded number of deviations for a particular Promotion Discount being 121 deviations.

- (A) To accommodate the deviations, and based on the average of 36 deviations, at least 36 additional Promotion Discount Records will need to be created in the POS system per Promotion Discount.
 - (B) Promotion Discount Records can only be set up manually – this means that specialist coding is required for each Promotion Discount Record by BDH's Information Technology Services Team, as Bakers Delight Bakeries cannot create the Promotion Discount Records autonomously. Every Promotion Discount Rule needs to be tested to ensure that it works as intended – for example, there may be a Promotion Discount for a four pack and six pack of hot cross buns. BDH's Information Technology Services Team must ensure that the Promotion Discount Record for a four pack Promotion Discount generates the correct price, and the price is updated when a sixth hot cross bun is added to the Shopping Cart to reflect the six pack Promotion Discount of hot cross buns.
 - (C) Up to **[CONFIDENTIAL]** new Promotion Discount Records will need to be set up in the POS system (calculated by reference to the number of Promotion Discounts that currently exist, multiplied by the average of 36 price deviations). Contrastingly, only one record needs to be set up in the POS system for every Individual Product which will be approximately **[CONFIDENTIAL]** records in total. Therefore, the creation and set up of Promotion Discount Records is an extremely labour-intensive and arduous process that requires significantly more resources to complete compared to Individual Product records.
 - (D) BDH introduces a number of new Promotion Discounts every year, some of which are seasonal. BDH will need to review, create, and test every Promotion Discount Record to ensure that the price is generated correctly in the POS system. This will also generate a significant amount of work for BDH's Information Technology Service Team;
- (ii) The Information Technology ("IT") services to support the configuration and operation of the retail systems (including the set up of the Promotion Discounts and Promotion Discount Records) are on-charged, at cost, to Franchisees as part of their IT services monthly fee. Any increase in the work effort for BDH's Information Technology Service Team will lead to an increase in those charges, so ultimately these increased costs are borne by Franchisees.
 - (iii) The supplier of the POS system has advised that additional Promotion Discount Records may degrade the performance of the POS system and make the POS system slower to use, given that there will be significantly more records (by way of a significant number of Promotion Discount Rules) to evaluate as Shopping Carts are assembled at the point of sale. To counter this, more "compute" resources can be added to the POS system, however, as with the additional effort to set up Promotion Discount Records, these costs are directly chargeable to Franchisees via the IT services fee, resulting in higher costs; and

- (iv) if the Proposed Conduct is not authorised then, subject to the intensity of inter-brand competition, some of the increased costs may ultimately be borne by end-consumers of BDH Products through price increases to enable Franchisees to recover their increased IT service costs.
- (f) Actual Promotion Discount pricing deviations from RRP have been assessed to determine the five price tiers to ensure that the price tiers reflect observed pricing practices of Bakers Delight Bakeries to minimise the impact of the Proposed Conduct. Some general observations about Promotion Discount pricing deviations using data from the current point of sale system are as follows:
 - (i) Of all existing Promotion Discounts reviewed by BDH, 70% of all price deviations occurred within three price tiers from the RRP. Schedule 4, as analysed below, provides examples of deviations that illustrate this.
 - (ii) Furthermore, 80% of all price deviations from the RRP occurred within four price tiers from the RRP.
 - (iii) Approximately 50% of Bakers Delight Bakeries deviate at least one Promotion Discount from the RRP.
 - (iv) Of those Bakers Delight Bakeries that deviate Promotion Discounts, on average they deviate around 10 Promotion Discounts.
 - (v) Promotion Discounts are deviated on average by 36 Bakers Delight Bakeries.
- (g) An example of the typical price deviation of a Promotion Discount is shown below. The “ABC” Promotion Discount has an RRP of \$11.00.
 - (i) ABC Promotion Discount was price deviated by 96 Bakers Delight Bakeries.
 - (ii) Of the Bakers Delight Bakeries that deviated from the RRP, 89% deviated within four price tiers from the RRP.
 - (iii) 53% of deviations were \$1.00 above the RRP.



- (h) Additional examples of Promotion Discount price deviations are set out in Schedule 4. The column headed “# of deviations” represents the number of Bakers Delight Bakeries which have deviated from the RRP with the price set

out in the third column titled "Price". General comments and observations are as follows:

- (i) Based on 278 price deviations, Bakers Delight Bakeries deviated \$0.90 above the RRP for Promotion Discount on average.
- (ii) The highest deviation above the RRP was \$10.80 whereas the lowest below the RRP was \$6.50.
- (iii) Only 3% of the 278 deviations were more than \$4.00 above the RRP and 5% were \$3.00 above the RRP.
- (iv) It is not uncommon for at least one Bakers Delight Bakery to deviate the price below the RRP. However, less than 10% of the 278 price deviations occurred below the RRP.
- (v) Combinations A – D represent typical price deviations in Promotion Discount which were slightly above the RRP.
- (vi) The price deviation of a Promotion Discount can sometimes be extreme, as seen in Combination H. In this example, one Bakers Delight Bakery set the price at \$5.50 below the RRP and two Bakers Delight Bakeries set a price of \$10.80 above the RRP.

An explanation for this would be that each individual Bakery must price their products in line with its unique circumstances such as its occupancy costs, the price sensitivity of its customers and the number of competitors in the region.

- (vii) Even though BDH and Franchisees could select their own pricing in the data presented, a majority of the deviations occurred within a converged range of price tiers.
 - (A) In Combination I, 80% of price deviations occurred within -\$0.50 to \$1.50 from the RRP.
 - (B) Even in Combination E which contains a larger sample size of 51 price deviations, approximately 78% of price deviations occurred within \$0.50 to \$1.50 above the RRP.
 - (C) Similarly, in Combination F 80% of price deviations with a sample size of 47 deviations occurred within \$0.50 to \$2.00 above the RRP.
 - (D) Combination J records price deviations below and above the RRP. Despite this, 75% of all price deviations occurred within \$0.50 to \$1.00 above the RRP.
- (i) To address the limitation with the POS system set out in paragraph 3.3(d) it is proposed to establish five price tiers, including the RRP for each Promotion Discount determined and specified by BDH. These price tiers will be established after considering the current pricing practices of Bakers Delight Bakeries as summarised in paragraph 3.3(f) and 3.3(h).
- (j) Bakers Delight Bakeries will be able to deviate to one of the five price tiers available for that Promotion Discount, with such price tiers reflecting the majority of the current deviations.

- (k) The Proposed Conduct requires approximately [CONFIDENTIAL] Promotion Discount Records to be set up, compared to [CONFIDENTIAL] Promotion Discount Records, based on the average of 36 deviations, which would be required if the Proposed Conduct is not authorised.
- (l) The Proposed Conduct **will not**:
- (i) remove the ability of BDH and Franchisees to deviate the pricing of Individual Products, which account for approximately [CONFIDENTIAL]% of total sales for a Bakers Delight Bakery. As discussed, this is because Individual Products and Promotion Discount are coded differently in the POS system, whereby only Promotion Discounts will be affected by the limitation;
 - (ii) significantly impact the ability of Bakers Delight Bakeries to deviate a Promotion Discount to a price tier that meets their individual Bakery needs. There will be some Bakers Delight Bakeries that cannot deviate to an arbitrary price tier, however, the choice of price tiers based on current pricing practices will cater for their needs;
 - (iii) increase prices for Promotion Discount because five price tiers will be specified by BDH and will range from below the RRP for the Promotion Discount to above the RRP for the Promotion Discount.

3.4 The term of authorisation sought, and reasons for seeking this period

(a) Interim authorisation

BDH seeks an interim authorisation under section 91(2)(d) of the CCA. BDH is in the process of negotiating the contract for the new POS system, and implementation of the new POS system is anticipated to take place in October 2023.

BDH and current Franchisees will be expected to engage in Proposed Conduct from the implementation date of the new POS system.

The new POS system should be implemented as soon as practicable so that BDH and its Franchisees can take advantage of the upgrades to the POS functionality and remain competitive.

The current contract for the existing POS solution used by BDH expires in April 2024 and BDH is looking to move to the new POS solution well ahead of this deadline to avoid the need to renew the current contract for an additional two years.

There will be little impact on Franchisees if the interim authorisation is granted, because, as submitted in paragraph 3.3(d), there are limited restrictions to Franchised Bakeries that will be imposed under the new POS system.

(b) Final authorisation

BDH seeks authorisation for a period of five years from the date of the ACCC's final determination.

BDH considers that five years is appropriate for the following reasons:

- changing a POS system is a major undertaking and not something that BDH will pursue again for at least 5 years, unless there are major unexpected issues with the new system or it is not fit for purpose; and

- while there will be a slight adjustment for the Bakers Delight Bakeries when BDH implements the POS system, BDH expects that they will quickly adopt the changes quickly and will subsequently prefer that no further changes are made and cause further disruption by changing the Promotion Discount pricing again.

4. LIST OF DOCUMENTS CONSIDERED BY THE APPLICANT FOR THE PURPOSES OF ASSESSING OR MAKING A DECISION IN RELATION TO THE PROPOSED CONDUCT

The Applicant considered:

- the agreement for the POS system and advice from the POS system supplier that there is a limitation in that the POS system does not easily accommodate price deviation for Promotion Discount; and
- the list of Promotion Discounts in Schedule 3 of this Application.

5. NAMES OF PERSONS, OR CLASSES OR PERSONS, WHO MAY BE DIRECTLY IMPACTED BY THE PROPOSED CONDUCT, AND HOW OR WHY THEY MIGHT BE IMPACTED

The Proposed Conduct is likely to impact the following classes of persons:

(a) BDH when it operates Company Bakeries and Franchisees who operate Franchised Bakeries which range Promotion Discounts:

BDH provides the RRP as a guide for a Bakers Delight Bakery to generate a profit based on average sales of BDH Products and Promotion Discounts. In calculating the RRP, BDH considers the average input costs of a Bakers Delight Bakery, including the costs of ingredients, occupancy costs, labour and utilities.

As stated above, Bakers Delight Bakeries can exercise their discretion to deviate the price of Promotion Discounts above or below the RRP. There are unique variables that affect the operating costs of each Bakers Delight Bakery, such as occupancy costs. Bakers Delight Bakeries may choose a higher deviation from the RRP to recover such costs or to increase their profit margin.

To maximise profits and remain competitive, Bakers Delight Bakeries must consider that a higher price deviation from the RRP will reduce sales.

Bakers Delight Bakeries can currently select any price deviation from the RRP.

Due to the implementation of the POS system, the Proposed Conduct will require Bakers Delight Bakeries to only deviate prices over five price tiers for each Promotion Discount, but as discussed above, these price tiers will accommodate current pricing practices of the Bakers Delight Bakeries and will have minimal impact on the status quo.

Bakers Delight Bakeries will receive the following benefits from the Proposed Conduct:

- (i) being able to offer Promotion Discount at prices that suit their specific customers and better compete with competitors; and

- (ii) being able to process transactions for Promotion Discount more efficiently than if the products are not bundled and have to be individually selected and discounted.

Franchisees have been consulted about the implementation of the POS system and are supportive of the change. Franchisees have previously provided negative feedback on the current point of sale system, including encountering issues with reliability and performance.

Franchisees have not been specifically consulted in relation to the price tiers of Promotion Discount. The tiers have been based on data available on the current point of sale system.

If the Proposed Conduct is not authorised, then on average there will be 36 different Promotion Discount Records per Promotion Discount which may slow down the time it takes for the POS system to process each customer transaction. The customer experience and reputation of the Bakers Delight Network may be harmed if the sales check out process is slower for customers. This may harm the competitiveness of Bakers Delight Bakeries, against competitors who offer more convenient and expedient point of sale systems.

The Proposed Conduct will minimise set up costs associated with the POS system – if the Proposed Conduct is not authorised then the additional set up fees that apply will be on-charged to Bakers Delight Bakeries and then consumers through higher product prices.

- (b) **Consumers** who acquire Promotion Discount – who will purchase the Promotion Discount for a price within five price tiers. The restricted price range may be higher or lower than the price that the Bakers Delight Bakeries would otherwise set for the Promotion Discounts.

As discussed above, consumers will experience a slower check-out process at the sales counter if the Proposed Conduct is not authorised. This is because the processing speed of the POS system will be slower with a significant number of additional Promotion Discount Records to be evaluated.

If the Proposed Conduct is authorised, then consumers should not notice any difference in their check-out experience as the experience should be similar or more efficient than the current point of sale system.

- (c) **Other Franchisees** – the Proposed Conduct may promote intra-brand competition with Franchised Bakeries having a choice of price tiers, with one being lower than the RRP. A Franchised Bakery can still compete with other Franchisees who operate Franchised Bakeries in a proximate location by selecting between price tiers for Promotion Discounts and is not restricted to select from price tiers when pricing Individual Products.
- (d) **Competitors** of BDH –Competitors will be encouraged to match BDH's innovation with their own improved POS systems and discounts.
- (e) **Suppliers** to BDH – for avoidance of doubt, BDH does not foresee that the Proposed Conduct will affect suppliers to the Bakers Delight Network, aside from the supplier of the POS system that will be implementing the price tiers.

The Proposed Conduct will be taking place at the end of the manufacturing/retail process after suppliers have already supplied goods and services to the Bakers Delight Bakery, so the pricing of Promotion Discount to end-consumers will not affect the relationship or cost of goods of suppliers.

MARKET INFORMATION AND CONCENTRATION

6. PRODUCTS AND/OR SERVICES AND GEOGRAPHIC AREAS RELEVANT TO THE APPLICANTS

(a) Market

BDH has not undertaken a comprehensive market analysis. The relevant market is that of the manufacture and retail sale fresh baked bread, bread based products and pastry based products. It is a highly competitive market, whereby consumers can purchase fresh or processed bread at a vast numbers of retailers including bakeries, delicatessens, fruit shops, supermarkets and convenience stores.

BDH notes the Notifications lodged by other retailers in particular 7-Eleven Australia Pty Limited and 7-Eleven Stores Pty Limited RPN10000459 and RPN10000460 for resale price maintenance relating to the specification of standard prices for products sold through the 7-Eleven e-commerce channel and consider this to be much more restrictive than the curtailing of pricing flexibility for Promotion Discount advocated in this Application.

(b) Products

BDH sells a wide range of freshly baked bread, bread based products and pastry based products developed by Bakers Delight. BDH Products can be purchased individually or combined with other products as Promotion Discounts.

BDH's full product range is listed in Schedule 2 of this Application.

This Application relates to Promotion Discounts, as listed in Schedule 3 of this Application.

(c) Geographic Areas

As of the date of this Application, the number and location of existing Bakers Delight Bakeries in Australia are as follows:

State/Territory	Existing Franchised Bakeries	Existing Franchisees	Company Bakeries
NSW & ACT	169	124	0
VIC & TAS	190	135	5
QLD	49	37	0
SA & NT	41	35	0
WA	52	35	0
TOTAL	504	366	5

The table above shows Existing Franchised Bakeries, being the number of actual Bakers Delight Bakeries operated by Bakers Delight Franchisees, and Existing Franchisees being the number of Franchisee entities that own and operate the Franchised Bakeries. In summary there are a total of 504 Franchised Bakeries operated by 366 Franchisees because Franchisees own more than one Franchise Bakery. There are 5 Company Bakeries owned and operate by BDH. The 5 Company Bakeries and the 504 Franchised Bakeries are located within varying proximities of one another. BDH and its Franchisees compete horizontally, BDH does not supply products to Franchisees for on-sale.

7. RELEVANT INDUSTRY

The relevant industry is the retailing of bread, bread-based products and pastry based products which products are intended to be purchased and consumed off-site by end-consumers.

8. OVERLAPPING PRODUCTS AND INTRA-BRAND COMPETITION

The products sold by Company Bakeries will overlap with the products sold by Franchised Bakeries, as they have the option of stocking the entire range of BDH Products.

The Proposed Conduct is limited to Promotion Discount. Schedule 3 of this Application lists the Promotion Discounts which will be affected by the Proposed Conduct.

The Proposed Conduct will only affect the pricing of Promotion Discount, which accounts for [CONFIDENTIAL]% of total sales of a Franchised Bakery (on average). BDH only mandates approximately [CONFIDENTIAL]% of Promotion Discount to be offered for sale by Franchised Businesses, and in respect of the remaining Promotion Discounts Franchisees can choose what Promotion Discounts to offer for sale so there will be little impact on intra-brand competition as Bakers Delight Bakeries do not offer the entire range of Promotion Discounts.

Franchised Bakeries can continue to set any price for Individual Products.

It is emphasised that there is very little intra-brand competition between Company Bakeries and Franchised Bakeries. Based on data from consumers who are registered with the BDH loyalty program, over a three month period [CONFIDENTIAL]% of the purchases are with the one bakery. This means that consumers are typically loyal to one Bakers Delight Bakery, and are unlikely to purchase from other Bakers Delight Bakery with different pricing of BDH Products.

Company Bakeries only compete with Franchised Bakeries to a minor extent given there are so few Company Bakeries and the competition will be with Franchised Bakeries that are proximate to the location of Company Bakeries. As at the date of this Application there are 5 Company Bakeries as follows:

Bakery	Address
Camberwell	515 Riversdale Road, Camberwell 3124
Hawthorn	748 Glenferrie Road, Glenferrie 3122
Kew	129 Rear of High Street, Kew 3101
Mount Waverley	Mt Waverley Village Shopping Centre, 49 Hamilton Place, Mount Waverley 3149
Stud Park	Shop 15, Stud Park Shopping Centre, Cnr Stud Road and Fulham Road, Rowville 3178

The 5 Company Bakeries are more than 5 kilometres away from Franchised Bakeries.

[CONFIDENTIAL].

9. COMPETITION FACED BY THE PARTIES TO THE PROPOSED CONDUCT, AND FACTORS THAT WOULD MINIMISE COMPETITION

9.1 Competition

BDH has not undertaken a comprehensive market analysis. The relevant market for retailing of baked bread, bread based products and pastry based products, is highly competitive. Consumers can purchase fresh or processed bread at a vast number of retailers including bakeries, delicatessens, fruit shops, supermarkets and convenience stores.

(a) Bakeries

Bakers Delight Bakeries compete directly with manufacturer/retailer bakeries such as Brumby's Bakery, Breadtop, BonBons Bakery, Woodfrog and other independent bakeries.

Furthermore, some Coles and Woolworths supermarkets contain a fresh bakery department which sell products similar to those available at Bakers Delight Bakeries.

The Roy Morgan Research Single Source Australia, July 2017 – June 2018 Bread Market Report as attached in Schedule 5 indicated that in this time period, Woolworths and Coles represented a combined 51.9% of the fresh bread market, with Bakers Delight Bakeries representing 13.6%. In the period of July 2009 to June 2010, these figures were 46.2% and 13.1% respectively.

The Roy Morgan Research Single Source Australia, January – December 2022 Bread Market Report as attached in Schedule 6 indicates that the fresh bread market decreased from \$2.9 billion in 2018 to \$2.5 billion in 2022. The market share captured by Woolworths and Coles increased to 60.4%, with supermarkets comprising of 78.2% of the market. Bakers Delight's market share decreased to 9.3%, though its customers spent more at Bakers Delight on average compared to its competitors.

There is an upward trend towards customers purchasing from supermarkets compared to Bakers Delight and other bakeries. Smaller brands such as BDH must innovate to improve productive efficiency and reduce their retailers' costs, and

facilitate and encourage their retailers to apply promotion discounts. In any event, the Proposed Conduct would affect a relatively small share of consumers in the fresh bread market.

BDH does not have access to any reports or data about the bakery/fresh bread market which excludes the market share of supermarkets.

(b) Bakery Cafés

Bakery cafés are a popular business model, whereby consumers can purchase and consume breads, pastries, and coffee within the premises.

Bakers Delight Bakeries compete with these businesses indirectly, as some of these businesses are retailers only (they do not manufacture the products), and some businesses may specialise in products other than bread such as cakes or cookies.

Examples of these businesses include Laurent Bakery, 85 Degree Café, Banjo's Bakery Café and Ferguson Plarre's Bakehouse.

(c) Processed / pre-packaged Bread

BDH indirectly competes with retailers that sell processed or pre-packaged bread, such as Coles, Woolworths, Aldi and other independent supermarkets and convenience stores.

9.2 Countervailing Factors to the Proposed Conduct

(a) Innovation of products

The industry continues to develop new products and product ranges.

Recent examples include:

- (i) BDH's introduction of Blueberry and White Chocolate Hot Cross Buns in 2023;
- (ii) Coles' Gluten-free and low-carb range of bread; and
- (iii) Woolworths' "Crafted Range of Sourdough" breads.

(b) Retail services

The industry competes in its use of technology, marketing and provision of services.

Examples include:

- (i) the introduction of self-serve bread slicers at selected Coles supermarkets;
- (ii) BDH's introduction of online delivery, through its partnerships with UberEats and Menulog;
- (iii) Bakers Delight Bakeries providing product samples;
- (iv) Brumby's Bakeries' promotional collaboration with the movie LYLE, LYLE CROCODILE; and

(v) the introduction of loyalty programs and mobile apps, such as the Bakers Delight Dough Getters Loyalty Program.

(c) Potential for new entrants in the market

There is potential for the bakery industry to welcome new entrants that introduce bakery products from different parts of the world, such as a focus on Middle Eastern breads.

There is also a growing market for artisanal breads and baked goods, as evidenced by the rapid growth of Rustica and Lune, which now have over five stores each.

These innovations and potential market entrants have affected and in particular, led to increased competition in market for the retail of baked bread, bread based products and pastry based products by:

- (a) expanding the competitors who offer baked bread, bread based products and pastry based products;
- (b) widening the geographic boundaries of the markets in which Bakers Delight Bakeries compete; and
- (c) improving the efficiency and value proposition to consumers.

PUBLIC BENEFITS

10. PUBLIC BENEFITS THAT ARE LIKELY TO RESULT FROM THE PROPOSED CONDUCT

(a) **Efficiencies in supply**

Bakers Delight Bakeries will be able to offer Promotion Discounts through the centralised POS system and consumers can conveniently and efficiently purchase Promotion Discounts from Bakers Delight Bakeries through the centralised POS system.

By engaging in the Proposed Conduct, BDH and Franchisees will use a streamlined interface that only contains five pricing deviations per Promotion Discount. If the Proposed Conduct is not authorised, then BDH will need to set up over **[CONFIDENTIAL]** Promotion Discount Records in the POS system which will cause a degradation of system performance.

This would also cause delay in the processing of customer transactions which has a detrimental impact on the customer service experience.

The POS System is a superior system to the current system with additional features and improvements including integrated payment gateway, more secure payment options, better layout and user interface and more customer support from the supplier. This will provide greater efficiencies in serving customers and processing transactions. Furthermore, the supplier of the POS system is a multinational company so it can better facilitate BDH's global business and expansion plans and be implemented in other jurisdictions.

(b) **Brand reputation**

The Proposed Conduct will limit any excessive prices by Bakers Delight Bakeries by putting a limit on how far they can deviate from the RRP, such as the two Bakers Delight Bakeries that deviated by \$10.80 above the RRP in the example of Combination H of Schedule 4. As in all franchise networks the behaviour of one franchisee can negatively impact the whole brand including other Franchisees.

By reducing the spread of price deviations throughout the Bakers Delight Network, consumers will benefit from the consistency in pricing particularly as some consumers may not be aware that prices are not consistent across the Bakers Delight Network. This is pertinent, given that consumers will want more certainty in pricing during an environment of high inflation and increasing costs of living.

(c) Lower Costs

Reducing the potential number of Promotion Discount Records in the POS system will ensure that the POS system is run at a lower cost.

If the Proposed Conduct is not authorised, then BDH will need to manually set up thousands of Promotion Discount Records in the POS system. This will be labour intensive and require more storage space in the POS system. These factors will increase technology costs and fees payable by Bakers Delight Bakeries.

By engaging in the Proposed Conduct, the costs detailed above will be avoided as only five price deviations per Promotion Discount will be set up on each POS system. The Proposed Conduct will save on technology costs and fees which would otherwise be passed onto Bakers Delight Bakeries and in turn to consumers in the form of higher prices to recoup increased costs.

Furthermore, the Proposed Conduct will tighten the spread of price deviations from the RRP and limit any excessive prices by Bakers Delight Bakeries by putting a limit on how far they can deviate from the RRP. Most extreme deviations are above the RRP, so the Proposed Conduct will reduce the maximum price payable for Promotion Discounts by consumers.

PUBLIC DETRIMENTS (INCLUDING LIKELY COMPETITIVE EFFECTS)

11. PUBLIC DETRIMENTS TO THE PUBLIC THAT ARE LIKELY TO RESULT FROM THE PROPOSED CONDUCT

The Proposed Conduct is not expected to result in any measurable detriments to the public. Possible detriments include:

(a) Increased/Higher Prices

Neither Company Bakeries or Franchised Bakeries have sufficient market power in the market for retail baked bread, pastries and other yeast raised products and the products relevant to the Proposed Conduct are limited to Promotion Discounts.

The Proposed Conduct is unlikely to cause any increase in product prices set by Bakers Delight Bakeries, as the Proposed Conduct will be setting five price tier deviations from the RRP for Promotion Discounts, which encapsulates the current pricing deviation practices of almost all Bakers Delight Bakeries. The

Proposed Conduct will create a range of Promotional Discounts for Bakers Delight Bakeries.

Furthermore, Company Bakeries and Franchised Bakeries will continue to be constrained from raising prices by:

- (i) intense competition from a large number of competitors offering the same/similar product ranges; and
- (ii) consumers, who are price sensitive, who can easily purchase product from competitors.

Competitors are unlikely to increase prices in response to the Proposed Conduct due to the same constraining factors.

As a result, the Proposed Conduct is not intended, and is not expected, to result in any increases to the price of products sold at Bakers Delight Bakeries.

(b) Cartel conduct – decreased intra-brand competition for Promotion Discounts

Intra-brand competition may be lessened as Bakers Delight Bakeries are restricted to compete using fixed price tiers for Promotion Discounts.

As submitted above, Promotion Discounts are a **[CONFIDENTIAL]** subset of products that Bakers Delight Bakeries sell, and only comprise **[CONFIDENTIAL]**% of total sales. Sales of Promotion Discounts would not be large enough to constitute a material loss in potential price competition in any relevant market.

Bakers Delight Bakeries can continue to set any price for Individual Products and there is considerable competition over the price of other products instead of Promotion Discount.

(c) Increased Technology Fees to Franchisees

The technology fees and costs payable by Franchisees may increase due to the implementation of the new POS system, which may then be passed on to consumers by way of increases in product prices. The technology fees may increase due to a number of factors, including:

- (i) Inflation. The fee for the current point of sale system has also increased, so the technology fees for Bakers Delight Bakeries will increase regardless of the change in point of sale system;
- (ii) The additional features and improvements that will be derived from the POS system including: integrated payment gateway, more secure payment options, better layout and user interface and more customer support from the supplier. Furthermore, the supplier of the POS system is a multinational company so it can better facilitate BDH's global business and expansion plans and be implemented in other jurisdictions; and
- (iii) increase in fees that are not related to the POS system implementation, such as increases in the salary of BDH Information

Technology Services team employees which would also impact the costs of the current point of sale system.

The increased fee is not solely caused by the implementation of the POS system. It is noted that the technology fees and costs will be increased regardless of the Proposed Conduct taking place and that if the Proposed Conduct does not occur then the technology fees may be further increased to set up the additional Promotion Discount Records in the POS system.

The Proposed Conduct will not lessen competition in the relevant market because:

- (a) the market is highly competitive; and
- (b) Bakers Delight Bakeries do not have a substantial degree of power in the relevant markets and there are a large number of retailers in Australia.

BDH submits that the benefits of the Proposed Conduct will outweigh any possible detriment arising from the Proposed Conduct.

CONTACT DETAILS OF RELEVANT MARKET PARTICIPANTS

12. CONTACT DETAILS OF INTERESTED PARTIES

Company	Phone Number	Email Address or other contact detail
Bakeries, bakery cafés and supermarkets that sell fresh bread		
Brumby's Bakery	(07) 5591 3242	rfga@rfg.com.au Retail Food Group National Office: Level 4, 35 Robina Town Centre Drive, Robina, Queensland, 4226
Ferguson Plarre's Bakehouses	(03) 9336 3200	customerservice@fergusonplarre.com.au
Woodfrog Bakery	(03) 9077 5440	info@woodfrogbakery.com.au
Breadtop	(03) 9417 4200	info@breadtop.com.au
BonBons Bakery	1300 305 804	inquiry@bonbonsbakery.com.au
Banjo's Bakery	(03) 6210 5000	GPO Box 491, Hobart, Tasmania, 7001
Goldstein's Bake Shop	(07) 5539 3133	509 Olsen Avenue, Molendinar, Queensland, 4214
Laurent Bakery	(03) 9915 0100	information@laurent.com.au
Coles Group – Coles Supermarkets	(03) 9829 5111	800 Toorak Road, Hawthorn East, Victoria, 3123
Woolworths Group – Woolworths Supermarkets	1300 767 969	1 Woolworths Way, Bella Vista, New South Wales, 2153

Other		
Australian Association of Franchisees	(03) 8002 7432	info@aaf.asn.au
Franchise Advisory Centre	(07) 3716 0400	Strong Avenue, Graceville, Queensland, 4075
Franchise Council of Australia	(03) 9508 0888	Level 19, 567 Collins Street, Melbourne, Victoria, 3000
Baking Association of Australia	(02) 4340 0244	PO Box 574, Gosford, New South Wales, 2250
National Baking Industry Association	(07) 3899 6100	nbia@nbia.org.au
Franchisees	Refer to list at Schedule 1 of this Application	Refer to list at Schedule 1 of this Application

ADDITIONAL INFORMATION

13. ADDITIONAL INFORMATION AND DOCUMENTS IN SUPPORT

Not Applicable

Declaration by Applicant(s)

The undersigned declare that, to the best of their knowledge and belief, the information given in response to questions in this form is true, correct and complete, that complete copies of documents required by this form have been supplied, that all estimates are identified as such and are their best estimates of the underlying facts, and that all the opinions expressed are sincere.

The undersigned undertake(s) to advise the ACCC immediately of any material change in circumstances relating to the application.

The undersigned are aware that giving false or misleading information is a serious offence and are aware of the provisions of sections 137.1 and 149.1 of the *Criminal Code* (Cth).



Signature of authorised person

Global IT Director

Office held

Ciaran Loughlin

(print) Name of authorised person

29-Aug-2023

This _____ day of _____ 20____

Schedule 1 : List of Franchisees

Please see document attached separately to this application.

[CONFIDENTIAL]

Schedule 2 : Full Product Range

Please see document attached separately to this application.

[CONFIDENTIAL]

Schedule 3 : List of Promotion Discounts

Please see document attached separately to this application.

[CONFIDENTIAL]

Schedule 4 : Promotion Discount Deviation Examples

Combination	RRP	Price	# of deviations	RRP deviation
A	\$ 10.00			
		\$ 10.50	4	\$ 0.50
		\$ 11.00	2	\$ 1.00
		\$ 12.00	4	\$ 2.00
		\$ 13.00	1	\$ 3.00
B	\$ 7.70			
		\$ 8.00	2	\$ 0.30
		\$ 8.20	1	\$ 0.50
		\$ 8.50	4	\$ 0.80
		\$ 9.70	1	\$ 2.00
C	\$ 9.00			
		\$ 7.50	1	-\$ 1.50
		\$ 9.00	1	\$ -
		\$ 9.20	1	\$ 0.20
		\$ 9.50	6	\$ 0.50
		\$ 10.00	6	\$ 1.00
		\$ 11.00	9	\$ 2.00
		\$ 11.50	1	\$ 2.50
		\$ 12.50	1	\$ 3.50
D	\$ 9.00			
		\$ 7.50	1	-\$ 1.50
		\$ 9.20	1	\$ 0.20
		\$ 9.50	4	\$ 0.50
		\$ 10.00	9	\$ 1.00
		\$ 11.00	13	\$ 2.00
		\$ 11.50	1	\$ 2.50
		\$ 12.50	1	\$ 3.50
E	\$ 12.00			
		\$ 11.50	3	-\$ 0.50
		\$ 12.00	2	\$ -
		\$ 12.30	2	\$ 0.30
		\$ 12.40	1	\$ 0.40
		\$ 12.50	15	\$ 0.50
		\$ 12.70	1	\$ 0.70
		\$ 12.80	2	\$ 0.80
		\$ 12.90	1	\$ 0.90
		\$ 13.00	6	\$ 1.00
		\$ 13.20	4	\$ 1.20
		\$ 13.50	11	\$ 1.50
		\$ 14.10	2	\$ 2.10
		\$ 14.40	1	\$ 2.40

Combination	RRP	Price	# of deviations	RRP deviation
F	\$ 12.00			
		\$ 11.00	4	-\$ 1.00
		\$ 12.00	1	\$ -
		\$ 12.50	8	\$ 0.50
		\$ 12.80	2	\$ 0.80
		\$ 13.00	10	\$ 1.00
		\$ 13.50	2	\$ 1.50
		\$ 13.60	2	\$ 1.60
		\$ 14.00	14	\$ 2.00
		\$ 14.80	1	\$ 2.80
		\$ 15.00	2	\$ 3.00
		\$ 16.00	1	\$ 4.00
G	\$ 6.50			
		\$ 6.60	1	\$ 0.10
		\$ 7.00	5	\$ 0.50
		\$ 7.10	2	\$ 0.60
		\$ 7.40	1	\$ 0.90
		\$ 7.50	6	\$ 1.00
		\$ 8.00	9	\$ 1.50
		\$ 8.50	1	\$ 2.00
		\$ 8.80	1	\$ 2.30
		\$ 9.00	5	\$ 2.50
		\$ 10.00	1	\$ 3.50
		\$ 12.00	1	\$ 5.50
H	\$ 8.00			
		\$ 2.50	1	-\$ 5.50
		\$ 8.50	2	\$ 0.50
		\$ 12.00	1	\$ 4.00
		\$ 18.80	2	\$ 10.80
I	\$ 7.50			
		\$ 6.00	1	-\$ 1.50
		\$ 6.50	1	-\$ 1.00
		\$ 7.00	4	-\$ 0.50
		\$ 8.00	13	\$ 0.50
		\$ 9.00	3	\$ 1.50
		\$ 10.00	1	\$ 2.50
		\$ 12.00	1	\$ 4.50
		\$ 13.50	1	\$ 6.00
J	\$ 11.50			
		\$ 5.00	1	-\$ 6.50
		\$ 5.75	2	-\$ 5.75
		\$ 6.00	2	-\$ 5.50
		\$ 6.25	1	-\$ 5.25
		\$ 6.50	1	-\$ 5.00
		\$ 8.00	1	-\$ 3.50
		\$ 12.00	15	\$ 0.50
		\$ 12.50	16	\$ 1.00
		\$ 13.50	1	\$ 2.00
		\$ 15.00	1	\$ 3.50

Schedule 5 : Roy Morgan Single Source Australia, July 2017 – June 2018

Article No. 7711
 Available on www.roymorgan.com
 Link to Roy Morgan Profiles



Friday, 31 August 2018

The battle for the \$2.9bn fresh bread market

Australia's \$2.9 billion fresh bread market is dominated by the two supermarket giants Woolworths Group and Coles Group who represent a combined 51.9% of the fresh bread market according to the latest Roy Morgan results in the year to June 2018.

In total, supermarkets now comprise over two-thirds of the entire fresh bread market with the remaining 31% split between specialty bread shops including Bakers Delight, Brumby's Bakery and other bread shops, and between delicatessens, milk bars, convenience store and other stores.

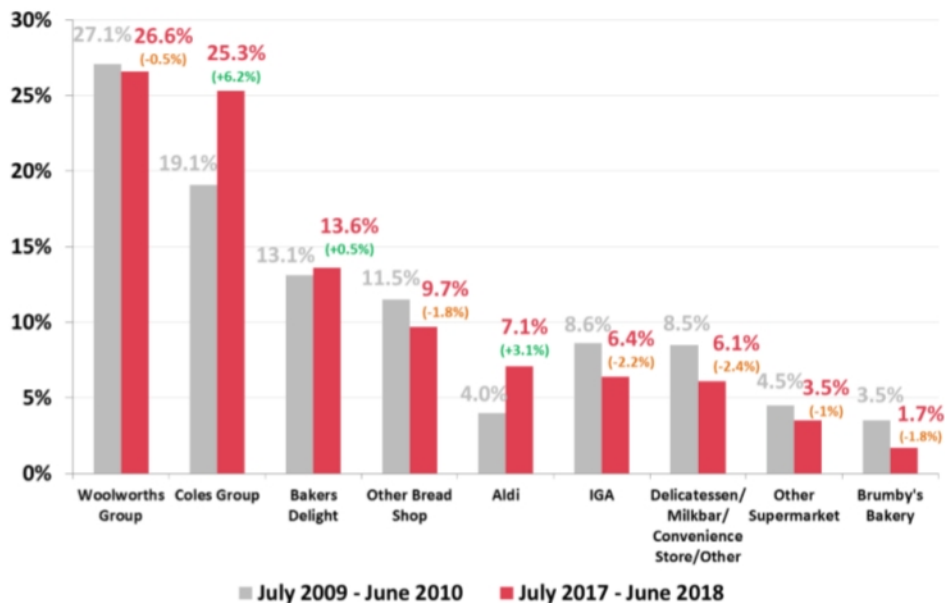
Over the last eight years there have been three stand-out performers in the fresh bread market. Coles Group has grown its market share by an impressive 6.2% to 25.3%, German supermarket chain Aldi has grown its market share by 3.1% to 7.1% and specialty bread shop Bakers Delight now has a market share of 13.6%, up by 0.5% from June 2010.

Despite facing a resurgent Coles in recent years Woolworths has retained its title as Australia's largest retailer of fresh bread capturing a market-leading 26.6% of the fresh bread market.

Other outlets for fresh bread including IGA and other supermarkets as well as Brumby's Bakery and other smaller bread shops and delicatessens, milk bars, convenience stores and other stores have also suffered declines in their share of the fresh bread market of between 1% - 2.4%.

These results are from the Roy Morgan Single Source survey of over 50,000 people per annum, including over 12,000 grocery buyers and covered in the latest [Roy Morgan Supermarket Grocery Currency Reports](#).

Australian fresh bread market share – 2010 vs 2018



Source: Roy Morgan Single Source Australia, July 2009 – June 2010, n=11,911 & July 2017 – June 2018, n=9,066.
 Base: Last 7 day fresh bread purchasers aged 14+ weighted to Australian households.

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Roy Morgan recently analysed the state of the overall grocery market in Australia which is valued at over \$100 billion per annum. The latest results show Woolworths and Aldi have been the two best performers in the last year with both gaining significant market share. Further analysis, including the shares of the major supermarkets of the overall fresh food market, is available to [view here](#).

Michele Levine, CEO, Roy Morgan, says although Woolworths and Coles have now comprised over 50% of the fresh bread market for over five years, the success of Bakers Delight and Aldi in growing market share shows there is space for nimble competitors:

"The dominance of Australia's two supermarket giants Woolworths and Coles is well known with the two now comprising over half the Australian markets for fresh food including fresh meat, fresh fruit & vegetables and fresh bread. Between them Woolworths and Coles now have nearly 52% of the Australian fresh bread market.

"However, although the two clearly dominate Australia's fresh bread market, the growth this decade has been led by Coles Group which has significantly increased its market share by 6.2% to 25.3% while Woolworths is little changed with 26.6% of the fresh bread market.

"There are two competitors in particular outside the 'Big 2' who have grown their share of the fresh bread market and they come from very different origins.

"German discount supermarket chain Aldi has made a huge impression on the Australian marketplace since opening its first store just over 15 years ago in 2001 and now captures 7.1% of the fresh bread market, up 3.1% since 2010.

"Aldi's success has been built upon not only discount prices but also a reputation for reliability, meeting the needs of consumers and being honest about what it has to offer. Aldi has consistently rated as one of Australia's most trustworthy brands including retaining its spot as Australia's most trusted brand in this week's Roy Morgan Net Trust Score survey for July. [See more here](#) about Aldi's success what Australian brands need to do to build their trust.

"In addition to Aldi and Coles the other success story in the fresh bread market over the last eight years has been the Australian owned bakery chain Bakers Delight. Bakers Delight has resisted the strong competition in the fresh bread market to grow its share by 0.5% to 13.6%.

"Bakers Delight trails only the 'Big 2' as an outlet for fresh bread and this shows that a well-run business can take on and beat more highly capitalised competitors with a well-defined strategy in a 'niche' market by offering great customer service and excelling at their core competency.

"To stay ahead of the game and be fully prepared for the competitive pressures in a fast changing industry the extensive analysis available in the [Roy Morgan Supermarket & Fresh Food Currency Reports](#) which covers all food retailers, including products purchased and dollars spent is essential. The combination of the large annual sample collected over more than a decade enables a unique in depth trend analysis of this very significant market."

View Roy Morgan's [Supermarket & Fresh Food Currency Reports here](#) and for other reports and profiles visit the [Roy Morgan Online Store](#).

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About Roy Morgan

Roy Morgan is the largest independent Australian research company, with offices in each state of Australia, as well as in the United States and the United Kingdom. A full service research organisation specialising in omnibus and syndicated data, Roy Morgan has over 70 years' experience in collecting objective, independent information on consumers.



Margin of Error

The margin of error to be allowed for in any estimate depends mainly on the number of interviews on which it is based. Margin of error gives indications of the likely range within which estimates would be 95% likely to fall, expressed as the number of percentage points above or below the actual estimate. Allowance for design effects (such as stratification and weighting) should be made as appropriate.

Sample Size	Percentage Estimate			
	40%-60%	25% or 75%	10% or 90%	5% or 95%
5,000	±1.4	±1.2	±0.8	±0.6
10,000	±1.0	±0.9	±0.6	±0.4
20,000	±0.7	±0.6	±0.4	±0.3
50,000	±0.4	±0.4	±0.3	±0.2

FOR IMMEDIATE RELEASE



Article No. 9231
Available on www.roymorgan.com
[Link to Roy Morgan Profiles](#)



Tuesday, 16 May 2023

FOR IMMEDIATE RELEASE

Supermarkets dominate the fresh bread market but Bakers Delight captures an out-sized share of the dollars spent

Australia's \$2.5 billion fresh bread market is dominated by the two supermarket giants Woolworths Group and Coles Group who represent a combined 60.4% of the total dollars spent in the fresh bread market, according to the latest Roy Morgan results in the year to December 2022.

The dominance of the two major supermarkets has grown in recent years although the overall size of the fresh bread market is lower now than it was five years ago – now at \$2.5 billion compared to \$2.9 billion in mid-2018. [Roy Morgan covered the state of the fresh bread market in detail in 2018 when Coles and Woolies had a combined share of just over half – 51.9%.](#)

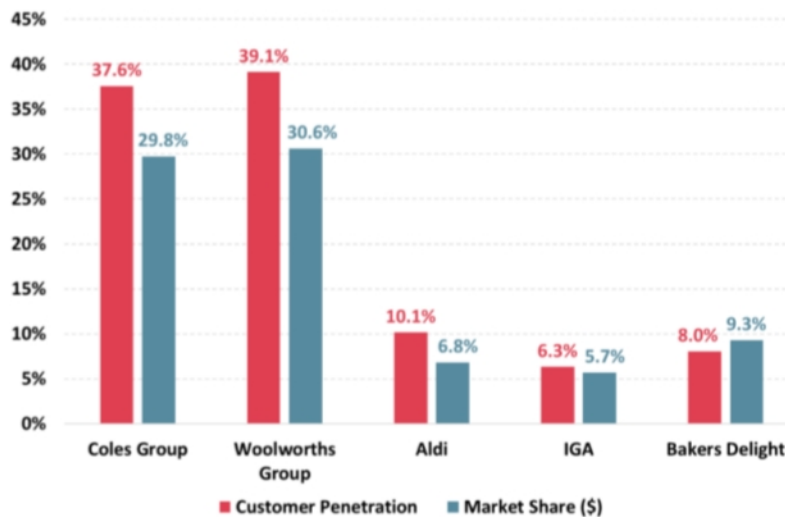
The latest Roy Morgan figures show that Woolworths has retained its title as Australia's largest retailer of fresh bread capturing a market-leading 30.6% of the spending in the fresh bread market, and just ahead of Coles Group on 29.8%.

In total, supermarkets now comprise over three-quarters (78.2%) of the entire fresh bread market with the remaining 21.8% split between specialty bread shops including Bakers Delight, Brumby's Bakery, other bread shops, and between delicatessens, milk bars, convenience stores and other stores.

Over the last eight years the three largest supermarkets have been the stand-out performers in the fresh bread market. Coles Group has grown its market share by an impressive 7.4% points to 29.8%, Woolworths Group is up 4.4% points to 30.6% and Aldi is up 1.4% points to 6.8%.

The two major supermarkets have clearly the largest customer penetration of Australians who shop for fresh bread with 39.1% of fresh bread buyers shopping at Woolworths in an average week and almost as many, 37.6%, shopping at Coles well ahead of Aldi (10.1%), Bakers Delight (8%) and IGA (6.3%).

Australian fresh bread market share (\$) vs. customer penetration



Source: Roy Morgan Single Source Australia, January – December 2022, n=37,288.
Base: Last 7-day fresh bread purchasers aged 14+ weighted to Australian households.

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Although Bakers Delight has lower customer penetration of fresh bread buyers (8.0%) than third placed supermarket Aldi (10.1%), the specialty fresh bread store has a significantly higher share of the overall dollars spent in the market: Bakers Delight (9.3%) cf. Aldi (6.8%).

This result shows that average spending on fresh bread at Bakers Delight is significantly higher than at its supermarket rivals including Coles Group, Woolworths Group, Aldi and IGA.

In-depth Roy Morgan research into Australia's grocery market shows that the overall market is valued at over \$116 billion per annum. For further analysis, including the shares of the major supermarkets within the overall fresh food market, purchase the [Roy Morgan Supermarket & Fresh Food Currency Report](#).

Michele Levine, CEO, Roy Morgan, says Australia's fresh bread market is increasingly dominated by the supermarket giants Woolworth and Coles, even as the overall size of the market has shrunk by around \$400 million since 2018:

"The dominance of Australia's two supermarket giants Woolworths and Coles is well known with the two now capturing over 60% of the spending on fresh bread in the Australian market – up from 48.6% in 2014 – an increase of over 10% points in under a decade.

"However, although the two major supermarkets have grown their share of the market – the overall market has shrunk in recent years and is now valued at around \$2.5 billion – compared to around \$2.9 billion in mid-2018.

"Despite the smaller size of the overall market, both Coles and Woolies have grown their share and also the total dollars spent on fresh bread at their stores. This growth has come at the expense of most of their smaller rivals including specialty bread stores such as Bakers Delight and Brumby's Bakery, and other stores including delicatessens and convenience stores.

"This growth was 'super-charged' during the COVID-19 pandemic as Australians flocked to the most trusted brands in the Australian market. [Woolworths and Coles were rated as the two most trusted brands in Roy Morgan's Net Trust rankings for 2022](#) ahead of other large retailers including Bunnings, Kmart, Myer and Big W.

"Although the two large supermarkets dominate the market there are several other brands performing well and capturing a slice of the 40% of the fresh bread spending outside of the 'Big 2'. Specialty bread outlet Bakers Delight captures 9.3% of the spending on fresh bread and is ahead of smaller supermarkets Aldi on 6.8% and IGA on 5.7%.

"Bakers Delight is also the only major brand in the fresh bread market that captures a higher share of the total spending than its customer penetration would suggest – only 8% of Australians who buy fresh bread in an average week shop at Bakers Delight.

"The higher than average spend on fresh bread means Bakers Delight trails only the 'Big 2' and shows that a well-run business can take on, and beat, more highly capitalised competitors. Underlying the success of Bakers Delight in the ultra-competitive fresh bread market is a well-defined strategy offering great customer service and excelling at their core competency.

"To stay ahead of the game and be fully prepared for the competitive pressures in a fast changing industry the extensive analysis available in the [Roy Morgan Supermarket & Fresh Food Currency Reports](#) which covers all food retailers, including products purchased and dollars spent is essential. The combination of the large annual sample collected over more than a decade enables a unique in-depth trend analysis of this very significant market."

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20,000	±0.7	±0.6	±0.4	±0.3
50,000	±0.4	±0.4	±0.3	±0.2

FOR IMMEDIATE RELEASE



Bakery	Street Address	City	Franchisee Company	Bakery Principal	Bakery phone
Albion Park Rail	179-183 Princes Highway	Albion Park Rail			02 4256 1488
Allambie Heights	151 Allambie Rd	Allambie Heights			02 9453 1222
Armidale	90-96 Marsh Street	Armidale			02 6772 8423
Artarmon	114 Hampden Rd	Artarmon			02 9419 2600
Avalon	51 Old Barrenjoey Rd	Avalon			02 8919 0587
Balgowlah	97 - 215 Condamine Street	Balgowlah			02 9949 7442
Balmain	269-271 Darling St	Balmain			02 9818 4310
Bankstown	Stacey St & North Tce	Bankstown			02 9709 6285
Bateau Bay 1	12 Bay Village Road	Bateau Bay			02 4332 2500
Bateau Bay 2	12 Bay Village Road	Bateau Bay			02 4332 2500
Batemans Bay	1 Perry Street	Batemans Bay			02 4472 7599
Bathurst	40 William St	Bathurst			02 6334 4676
Baulkham Hills	375-393 Windsor Road	Baulkham Hills			02 9686 4177
Bega	202 Carp St	Bega			02 6492 6266
Belconnen	Benjamin Way	Belconnen			02 6251 5150
Belmont Citi	41-45 Macquarie Street	Belmont			02 4048 2372
Belrose	58 Glen Street	Belrose			02 9453 9584
Berowra	1C Turner Road	Berowra			02 9131 6909
Blacktown	17 Patrick St	Blacktown			02 8437 7924
Bowral	37 Wingecarribee St	Bowral			02 4862 4888
Bulli	273 Princes Highway	Bulli			02 4284 6700
Camden	129 Argyle St	Camden			02 4655 1347
Campbelltown Marketfair	Cnr Tindall St & Kellicar Rd	Campbelltown			02 4545 1291
Canberra	148 Bunda Street	Canberra			02 6262 9555
Cardiff	Cnr Main Road & Macquarie Road	Cardiff			02 4032 8189
Caringbah	58 President Ave	Caringbah			02 9540 3487
Carlingford Court	Shopping Centre Carlingford Rd	Carlingford			02 9873 3376
Carnes Hill	100 Cowpasture Rd	Horningsea Park			02 9607 4091
Casula Mall	1 Kurrajong Road	Casula			02 9601 2344
Cessnock	1 North Ave	Cessnock			02 4990 1105

Charlestown	30 Pearson Street	Charlestown		02 4920 6747
Chatswood Chase	Cnr Archer St & Victoria Ave	Chatswood		02 9411 8548
Cherrybrook	Shepherds Dr	Cherrybrook		02 9484 3069
Coffs Central	35-61 High St	Coffs Harbour		02 6651 6055
Concord	48-62 Majors Bay Rd	Concord		02 8765 0977
Cooleman Court	8 Brierly St	Weston		02 6288 2239
Corrimal	270 Princess Hwy	Corrimal		02 4285 6122
Cronulla	49 Cronulla St	Cronulla		02 9527 5300
Crows Nest	11 Willoughby Rd	Crows Nest		02 9438 3222
Dapto Mall	Princes Hwy & Moombara St	Dapto		02 4261 4448
Dee Why Grand	15 Pacific Parade	Dee Why		02 7200 7037
Dickson	Dickson Shopping Centre	Dickson		02 6257 7741
Dubbo Orana Mall	56 Windsor Parade	Dubbo		02 6884 6344
Dural Mall	508 Old Northern Road	Dural		02 9653 9525
Eastgardens	152 Bunnerong Road	Pagewood		02 9349 3310
Eastgate	71-91 Spring Street	Bondi Junction		02 8084 7690
Edgeworth	720 Main Road	Edgeworth		02 4915 8663
Emu Plains	Cnr Great Western Hwy & Pyramid St	Emu Plains		02 4735 8766
Engadine Central	1031 Old Princess Hwy	Engadine		02 9520 7905
Erina	419 Terrigal Drive	Erina		02 4365 4677
Erina 2	419 Terrigal Drive	Erina		02 4365 5211
Fig Tree	19 Princes Highway	Figtree		02 4225 7288
Forestway	20 Forest Way	Frenchs Forest		02 8705 2030
Forster	Breese Parade	Forster		02 6557 6059
Freshwater	22 Albert Street	Freshwater		02 7200 5650
Glebe	341 Glebe Point Rd	Glebe		02 80472629
Glenmore Park	19 Glenmore Parkway	Glenmore Park		02 4733 1177
Gordon	802-808 Pacific Hwy	Gordon		02 9498 7007
Goulburn	9/13 Clinton Street	Goulburn		02 4208 3174
Goulburn Square	217 Auburn Street	Goulburn		02 4823 5660
Green Hills	1 Molly Morgan Drive	Green Hills		02 4934 7482

Greenwood Plaza	36 Blue St	North Sydney		02 8904 9444
Griffith	2 Yambil St	Griffith		02 6964 6200
Gungahlin Marketplace	33 Hibberson St	Gungahlin		02 6140 3905
Gungahlin Village	46-50 Hibberson Street	Gungahlin		02 6128 0705
Gymea	64 Gymea Bay Rd	Gymea		02 9531 6026
Hornsby Westfield	236 Pacific Highway	Hornsby		02 9987 0154
Hurstville	Cnr Cross St & Park Rd	Hurstville		02 9570 5048
Jamison	Bowman Street	Macquarie		02 6251 0909
Jerrabomberra	Limestone Dr	Jerrabomberra		02 6255 8488
Jesmond	28 Blue Gum Road	Jesmond		02 4955 0377
Junction Fair	Junction Fair	The Junction		02 9411 3670
Katoomba	177-179 Katoomba St	Katoomba		0415 496 427
Kellyville	90 Wrights Rd	Kellyville		02 8883 0085
Kincumber	43 Avoca Drive	Kincumber		02 9131 3921
Kings Langley	130 James Cook Drive	Kings Langley		02 8381 6591
Kotara	Cnr Park Ave & Northcott Dve	Kotara		02 4956 2142
Lake Haven	Lake Haven Dr	Gorokan		02 4393 1677
Lake Macquarie	46 Wilsons Road	Mount Hutton		02 4948 6507
Lane Cove	Burns Bay Rd	Lane Cove		02 9418 3849
Lanyon	4 Sidney Nolan Drive	Conder		02 6284 8348
Leichhardt	Cnr Marion & Flood St	Leichhardt		02 9564 5473
Lisarow	1 Parsons Road	Lisarow		02 4329 4334
Macarthur Square	200 Gilchrist Drive	Campbelltown		02 4627 4009
Macquarie Centre	Cnr Waterloo Rd & Herring Rd	North Ryde		02 8381 6173
Manuka	Cnr Franklin St & Flinders Way	Manuka		02 6232 7400
Marketown	Cnr National Park & Parry St	Newcastle West		02 4927 5144
Maroubra	737 Anzac Pde	Maroubra		02 9344 3688
Marrickville Metro	30 Victoria Rd	Marrickville		02 9565 4588
Mascot	1163 Botany Rd	Mascot		02 8021 0092
Menai	Allison Cres	Menai		02 8212 5575
Merrylands	1 Pitt Street	Merrylands		02 8199 3416

Miranda	600 Kingsway	Miranda		02 9531 6688
Mittagong Marketplace	197 Old Hume Hwy	Mittagong		02 4872 3222
Mona Vale	8-10 Waratah St	Mona Vale		02 9997 6225
Mosman	868 Military Road	Mosman		02 9968 4409
Mudgee	86 Mortimer St	Mudgee		02 6372 7556
Muswellbrook	19-29 Rutherford Road	Muswellbrook		02 6541 2833
Narellan	326 Camden Valley Way	Narellan Vale		02 4647 5754
Narrabeen	75-77 Waterloo Street	Narrabeen		02 9913 3965
Nepean Square Penrith	121 Station Street	Penrith		02 4732 3175
Neutral Bay	202-212 Military Rd	Neutral Bay		02 9904 2200
Newport	353A Barrenjoey Rd	Newport		02 9979 4487
North Rocks	328-336 North Rocks Rd	North Rocks		02 8459 9562
Northbridge	79/113 Sailors Bay Road	Northbridge		02 9967 9400
Norton Plaza	55 Norton St	Leichhardt		02 9568 6033
Norwest	4 Century Circuit	Baulkham Hills		02 8850 1221
Nowra Fair	60 East St	Nowra		02 4421 3544
Nowra Mall	18-20 Kinghorne Street	Nowra		02 4423 1104
Oatley	28 Frederick St	Oatley		02 9580 7045
Orange	227-237 Summer St	Orange		02 6361 2917
Pender Place	44 Elgin Street	Maitland		02 4933 9663
Penrith Plaza	585 High Street	Penrith		02 8325 3880
Pittwater Place	10 Park Street	Mona Vale		02 9997 6233
Plumpton	260 Jersey Road	Plumpton		02 8197 3526
Port Central	40-42 Horton Street	Port Macquarie		02 6583 4244
Raymond Terrace	35-39 William Street	Raymond Terrace		02 4032 8174
Revesby	19-29 Marco Ave	Revesby		02 9771 2969
Richmond Mall	271-281 Windsor St	Richmond		02 4502 3008
Richmond Marketplace	80 March Street	Richmond		02 4578 3219
Riverside Plaza	131 Monaro Street	Queanbeyan		02 6232 9142
Rockdale Plaza	Rockdale Plaza Dr	Rockdale		02 9553 8744
Rose Bay	718 New South Head Rd	Rose Bay		02 9388 2219

Roselands	Roselands Dr	Roselands		02 9759 6651
Rouse Hill	Windsor road	Rouse Hill		02 8206 9094
Rozelle	640 Darling St	Rozelle		02 8076 5811
Rutherford Marketplace	1 Hillview Street	Rutherford		02 49320933
Settlement City	Cnr Bay St & Park St	Port Macquarie		02 6584 3411
Shellharbour	211 Lake Entrance Road	Shellharbour		02 4297 5294
Singleton	Gowrie St	Singleton		02 6571 1477
Southgate - NSW	124 Cnr Port Hacking Rd & Princess H	Kangaroo Point		02 9522 9933
Springwood	206 Macquarie Rd	Springwood		02 4751 9011
St Ives	166-172 Mona Vale Rd	St Ives		02 9983 1711
St Leonards	201-205 Pacific Hwy	St Leonards		02 9436 3255
St Marys	Charles Hacket Dr	St Marys		02 9833 4466
Stanhope Gardens	2 Sentry Drive	Stanhope Gardens		02 8824 5360
Sturt Mall	135 Baylis St	Wagga Wagga		02 6921 7644
Tamworth	Cnr Bridge & Denne St	Tamworth		02 6762 0255
Tamworth Square	436 Peel St	Tamworth		02 6766 8334
Taree	Manning St	Taree		02 6551 4050
Thornton	Cnr Thomas Coke Dr & Taylor Ave	Thornton		02 3800 0190
Toormina	5 Toormina Road	Toormina		02 6658 7565
Top Ryde City	1026 Top Ryde City S/C	Ryde		02 9808 1181
Toronto	63 The Boulevarde	Toronto		02 4950 5905
Tuggerah	50 Wyong Road	Tuggerah		02 4351 1045
Tuggerah 2	50 Wyong Road	Tuggerah		02 4305 2835
Tuggeranong	Anketell St	Tuggeranong		02 6112 8381
Ulladulla	92 Princes Hwy	Ulladulla		02 4454 3133
Umina Beach	295 West St	Umina		02 4342 0255
Vincentia Marketplace	8 Moona Creek Road	Vincentia		02 4403 0402
Wagga Wagga	87 Baylis Street	Wagga Wagga		02 6921 4859
Wallsend	24 Kokera Street	Wallsend		02 4951 4788
Waratah	91-115 Turton Rd	Waratah		02 4960 9788
Warilla Grove	43-57 Shellharbour Road	Warilla		02 4296 6744

Warners Bay	32 John Street	Warners Bay		02 4948 2399
Warriewood	12 Jacksons Road	Warriewood		02 8004 1694
Warringah Mall	Cnr Condamine St & Pittwater	Brookvale		02 9907 1304
West Gosford	269- 299 Brisbane Water Drive	West Gosford		02 4305 2652
West Pennant Hills	558B Pennant Hills Rd	West Pennant Hills		02 9980 6122
Westfield Burwood	100 Burwood Road	Burwood		02 9745 6266
Wetherill Park	561-583 Polding Street	Wetherill Park		02 9609 2743
Winmalee	14-28 White Cross Road	Winmalee		02 4706 0421
Woden Plaza	Keltie Street	Woden Valley		02 6281 5502
Woy Woy	Railway St	Woy Woy		02 4339 4941
Wynyard	273 George St	Sydney		02 9252 1422
Wyoming	Cnr Pacific Hwy & Kinarra Ave	Wyoming		02 4329 0855
Wyong	18-34 Alison Rd	Wyong		02 4811 1576
Young	125 Boorowa St	Young		02 6382 2000

QLD

Bakery	Street Address	City	Franchisee Company	Bakery Principal	Bakery phone
Arana Hills	Cnr Patricks Rd & Dawson Pde	Arana Hills			07 3851 2632
Aspley	59 Albany Creek Road	Aspley			07 3863 0155
Ballina Fair	84 Kerr Street	Ballina			02 5630 1023
Birtinya	8 The Avenue	Birtinya			07 5327 3106
Brookside	Osborne Rd	Mitchelton			07 3355 3794
Buderim	67 Burnett Street	Buderim			07 5477 1233
Burleigh Heads	149 West Burleigh Road	Burleigh Heads			07 5520 2299
Camp Hill	25 Samuel St	Camp Hill			07 3324 9485
Caneland	Cnr Victoria Rd & Mangrove Rd	Mackay			07 4953 0696
Cannon Hill	1909 Creek Road	Morningside			07 3399 6553
Castletown	Woolcock Street & Kings Rd	Hyde Park			07 4420 3182
Currimundi	750 Nicklin Way	Currimundi			04 227 75770
Graceville	2 & 2/4 Bank Rd	Graceville			07 3278 4900
Gympie	Cnr Monkland St & Nash St	Gympie			07 5483 9833

Helensvale Plaza	12 Sir John Overall Drive	Helensvale		07 5689 2550
Hervey Bay	6 Central Ave	Hervey Bay		07 4124 6565
Hervey Bay Plaza	27 Torquay Road	Urraween		07 4194 0300
Hope Island Marketplace	99-103 Broadwater Avenue	Hope Island		07 5613 3501
Ipswich	Cnr Downs St & The Terrace	Ipswich		07 3281 3611
Kawana	119 Point Cartwright Drive	Kawana		07 5444 0177
Kenmore	2069 Moggil Rd	Kenmore		07 3720 2976
Loganholme	Cnr Pacific Highway & Bryants	Loganholme		07 3801 1866
Mango Hill	Cnr Anzac Avenue & Halpine Drv	Mango Hill		07 3491 9899
Margate	270 Oxley Avenue	Margate		07 3152 7659
Maroochydore	154-164 Horton Parade	Maroochydore		07 5443 7177
Maryborough-QLD	142 Lennox Street	Maryborough		07 4121 7911
Mermaid Waters	Cnr Bermuda & Markeri St	Mermaid Waters		07 5578 6825
Mooloolaba	Venning St	Mooloolaba		07 5452 5544
Morayfield	171 Morayfield Rd	Morayfield		0450 725 823
Mt Gravatt	55 Creek Road	Mount Gravatt		07 3849 1822
Murwillumbah	52-56 Wollumbin St	Murwillumbah		02 6672 5585
Newmarket	400 Newmarket Road	Newmarket		07 3356 5242
Noosa Junction	22 Sunshine Beach Rd	Noosa Junction		07 5448 0091
Oasis	75 Surf Parade	Broadbeach		07 5527 5633
Oxenford	2 Cottonwood Place	Oxenford		07 5573 2511
Paddington	107 Latrobe Terrace	Paddington		07 3367 3769
Palm Beach	155 Nineteenth Avenue	Elanora		07 5520 7666
Robina	19 Robina Town Drive	Robina		07 5562 0899
Robina Kitchens	19 Robina Town drive	Robina		07 5562 0899
Runaway Bay	Cnr Lae Dr & Morala Ave	Runaway Bay		07 5528 9040
Southport	Cnr Ferry Rd & Benowa Rd	Southport		07 5613 3122
Springfield Orion	1 Main Street	Springfield		07 3470 0409
The Gap	1000 Waterworks Rd	The Gap		07 3300 0812
Toowong	9 Sherwood Road	Toowong		07 3876 7572
Toowoomba Hooper Centre	187 Hume Street	Toowoomba		07 4613 1244

Townsville	310 Ross River Road	Cranbrook		07 4779 6600
Tweed City	54 Minjungbal Drive	Tweed City		0436 439 284
Windsor - Qld	142 Newmarket Rd	Windsor		07 3857 0041
Worongary	Cr Mudgeeraba Rd & Pacific Hwy	Worongary		07 5559 1199
Yeronga	429 Fairfield Road	Yeronga		07 3162 2721

SA/NT

Bakery	Street Address	City	Franchisee Company	Bakery Principal	Bakery phone
Blackwood	250 Main Rd	Blackwood			08 8278 3214
Brighton Central	525 Brighton Road	Brighton			0403 738 271
Burnside	447 Portrush Road	Glenside			08 8379 6199
Colonnades	54 Beach Road	Noarlunga Centre			08 8384 7077
Findon	303 Grange Rd	Findon			08 8235 0359
Fulham Gardens	Fulham Gardens Shopping Centre	Fulham Gardens			08 8353 8900
Gawler	Cnr Murray & Cowan St	Gawler			08 8522 6499
Glenelg	94A Jetty Rd	Glenelg			08 9117 2757
Goolwa	Hutchinson St	Goolwa			08 8552 1633
Hallett Cove	246 Lonsdale Road	Hallett Cove			08 8322 9960
Happy Valley	50 Kenihans Road	Happy Valley			08 8322 9399
Hilton	160 Sir Donald Bradman Drive	Hilton			08 7088 6506
Kurralta Park	153 Anzac Highway	Kurralta Park			08 8371 5396
Marion	Marion Shopping Centre	Oaklands Park			08 8377 2448
Marryatville	242 Kensington Road	Marryatville			08 8364 4622
Mawson Lakes	9-15 Main Street	Mawson Lakes			08 8349 9066
Mitcham	119 Belair Rd	Torrens Park			08 9172 4291
Mount Barker	McLaren St	Mount Barker			08 8398 4004
Mount Gambier - Commercial	145 Commercial Street E	Mount Gambier			08 8723 9935
Mount Gambier Compton Street	7 Compton Street	Mount Gambier			08 8723 0886
Munno Para	600 Main North Rd	Smithfield			08 8284 1771
Murray Bridge Marketplace	23-51 South Terrace	Murray Bridge			08 8531 2933
Newton - Gorge Road	Cnr Gorge Rd & Newton Rd	Newton			08 8336 2437

Newton - Montacute Road	299 Montacute Road	Newton		08 7088 6521
North Adelaide	'1 O'Connell Street	North Adelaide		08 8267 4752
Norwood	161-169 & 175 The Parade	Norwood		08 8331 7405
Park Holme	Oaklands Rd	Park Holme		08 8374 4671
Port Adelaide	200 Commercial Road	Port Adelaide		08 7088 6518
Port Lincoln	17 Porter St	Port Lincoln		08 8682 6780
Port Pirie	91-95 Grey Terrace	Port Pirie		08 8632 6466
Renmark	Renmark Ave and Twentieth St	Renmark		08 8586 4830
Southgate - SA	Cnr Hilliers & Sheriffs Rds	Morphett Vale		08 8186 3199
St Agnes	1244 North East Road	St Agnes		0466 917 996
St Clair	Cheltenham Parade	Cheltenham		08 8244 0422
Stirling	29 Mount Barker Road	Stirling		08 8339 4166
Stirling Mall	28 Mount Barker Road	Stirling		08 8339 4166
Tea Tree Plaza	976 North East Rd	Modbury		0438 442 015
The Hub	130-150 Hub Dr	Aberfoyle Park		08 8370 6955
Unley	204 Unley Rd	Unley		08 8357 9960
Victor Harbor	77 Torrens Street	Victor Harbor		08 8552 1633
Welland Plaza	522 Port Rd	Welland		08 8340 2977
West Lakes - SA	111 West Lakes Bvd	West Lakes		08 8235 9902
Whyalla	199 Nicholson Avenue	Whyalla		08 8644 1327

VIC/TAS

Bakery	Street Address	City	Franchisee Company	Bakery Principal	Bakery phone
Airport West	40 Louis St	Airport West			0491 757 046
Albury Centrepont	3/525 David Street	Albury			02 6041 5637
Altona	59 Pier St	Altona			03 9315 9700
Ararat	3 Ingor Street	Ararat			03 5352 5696
Armstrong Creek	500-540 Torquay Road	Armstrong Creek			03 52151378
Ascot Vale	195 Union Rd	Ascot Vale			03 9326 2084
Ashburton	178 High St	Ashburton			03 9885 2553
Bacchus Marsh	60 - 194 Main St	Bacchus Marsh			03 5367 1532

Bakery Hill	73 Victoria St	Ballarat		03 5333 3845
Ballarat City	7-25 Eastwood Street	Ballarat City		03 5333 1258
Balwyn	377 Whitehorse Rd	Balwyn		03 9836 4900
Barkly Square	90-106 Sydney Road	Brunswick		03 9387 7840
Beach–St - Frankston	217 Beach St	Frankston		03 9789 9541
Beaumaris	Reserve Rd	Beaumaris		03 9589 3140
Bellpost Shopping Centre	290-306 Anakie Road	Norlane		03 5274 9905
Belmont	164 High St	Belmont		03 5243 8550
Bendigo - Marketplace	116/120 Mitchell Street	Bendigo		03 5441 6377
Bentleigh	462 Centre Rd	Bentleigh		03 9557 9641
Bentons Square	210 Dunns Road	Bentons Square		03 5977 0277
Berwick	Cnr Lyall Rd & Wilson St	Berwick		03 9707 2119
Birallee Wodonga	Melrose Dr	Wodonga		02 6059 4400
Boronia Junction	123 Boronia Road	Boronia Junction		03 9762 0556
Brentford Square	484 Canterbury Road	Forest Hill		03 9878 6714
Bundoora	37 Plenty Rd	Bundoora		03 9466 9400
Burwood One	172-210 Burwood Highway	Burwood		03 9803 7810
Campbellfield	Cnr Sydney & Mahoneys Rd	Campbellfield		0492 974 253
Canterbury	72 Maling Rd	Canterbury		03 8560 5489
Carlton	319 Lygon St	Carlton		03 83831616
Carnegie	102 Koornang Rd	Carnegie		03 9564 8311
Caroline Springs	29-35 Lake Street	Caroline Springs		03 7002 6323
Casey Central	400 Narre Warren - Cranbourne Road	Narre Warren		03 8790 6555
Castlemaine	50 Mostyn St	Castlemaine		03 5470 6073
Chadstone	Dandenong Rd	Chadstone		03 9568 7339
Chelsea	426 Nepean Highway	Chelsea		03 9772 3295
Cheltenham	320 Charman Rd	Cheltenham		03 9584 5777
Chirside Park	239-241 Maroondah Highway	Chirside Park		03 9727 3233
Claremont Plaza	35 Main Rd	Claremont		03 6249 9117
Clifton Hill	330 Queens Pde	Clifton Hill		03 9486 7500
Cobram	50-52 Punt Rd	Cobram		03 5871 1055

Coburg	35 - 437 Sydney Rd	Coburg		03 9354 0665
Coburns	523/531 High Street	Melton		03 9746 7979
Colac	2-52 Bromfield Street	Colac		03 5231 6460
Cowes Woolworths	117-133 Thompson Avenue	Cowes		03 59259249
Craigieburn Central	350 Craigieburn Road	Craigieburn		03 9333 7579
Cranbourne	High Street	Cranbourne		03 5995 1025
Croydon	5-15 Kent Avenue	Croydon		03 9725 1699
Daylesford	Park Lane	Daylesford		03 5348 1512
Deniliquin	Hardinge St	Deniliquin		03 5881 8414
Diamond Creek	62B Hurstbridge Rd	Diamond Creek		03 9438 2132
Dingley	93 Centre Dandenong Rd	Dingley		03 9551 1773
Doncaster	619 Doncaster Road	Doncaster		03 9840 2100
Donvale	Cnr Doncaster Rd & Tunstall Rd	Donvale		03 9842 9171
Dromana	217-251 Point Nepean Road	Dromana		03 5987 3380
Drouin	71-100 Young Street	Drouin		03 5608 0145
Drysdale	16 Wyndham St	Drysdale		03 5253 1131
East Bentleigh	771 Centre Rd	East Bentleigh		03 9563 8655
Eastland	171-175 Maroondah Hwy	Ringwood		03 9876 8244
Echuca	18 Nish St	Echuca		03 5482 6120
Elsternwick	391 Glen Huntly Rd	Elsternwick		03 9532 4088
Eltham	16-18 Commercial Pl	Eltham		03 9439 4284
Elwood	120 Ormond Rd	Elwood		03 9531 1588
Endeavour Hills	92 Matthew Flinders Avenue	Endeavour Hills		03 9700 6035
Epping	Cnr Cooper & High St	Epping		03 9408 9399
Essendon North	Mt Alexander Rd	Essendon		03 9379 8311
Fairfield	88b Station St	Fairfield		03 9482 2488
Ferntree Plaza	Burwood Hwy	Ferntree Gully		03 9007 0111
Forest Hill	270 Canterbury Rd	Forest Hill		03 9894 4666
Fountain Gate - Coles	25-55 Overland Drive	Fountain Gate		03 8790 5757
Gateway Plaza Leopold	621/659 Bellarine Highway	Leopold		03 5250 3000
Geelong West	159 Pakington St	Geelong West		03 5221 0005

Gisborne	22 Brantome St	Gisborne		03 5428 4564
Gladstone Park	8-34 Gladstone Park Drive	Gladstone Park		03 9330 2698
Greensborough	25 Main Street	Greensborough		03 9432 0696
Hamilton	French Street	Hamilton		0460 016 648
Hampton	321 Hampton St	Hampton		03 9597 0888
Hastings	38 High St	Hastings		03 5979 2577
Hawksburn	555 Malvern Rd	Hawksburn		03 9191 1277
Healesville	251 Maroondah Highway	Healesville		03 5962 2911
Heathmont	144 Canterbury Rd	Heathmont		03 9720 4415
Hihett	284-286 Hihett Road	Hihett		03 9553 7098
Highpoint	120-200 Rosamond Rd	Maribyrnong		03 9317 9581
Highton	1-3 Bellevue Ave	Highton		03 5243 3399
Hoppers Crossing	50 Old Geelong Rd	Hoppers Crossing		03 9748 2907
Horsham	50a & b Darlot St	Horsham		03 5381 2115
Ivanhoe Plaza	4-12 Livingstone St	Ivanhoe		03 9499 8855
Karingal Hub	330 Cranbourne Road	Frankston		03 8459 2983
Keilor Downs	Taylor's Rd	Keilor Downs		03 9356 0144
Keilor Village	678 Old Calder Hwy	Keilor		03 9331 5705
Kilsyth	-18 - 520 Mt Dandenong Rd	Kilsyth		03 9723 1222
Kingston Village	Grubb Rd	Ocean Grove		03 4310 2123
Knox City	Burwood Highway & Stud Rd	Wantirna		03 8199 8424
Kyabram	171-173 Allan St	Kyabram		03 5852 2699
Kyneton	Rear 83-89 Mollison St	Kyneton		03 5422 6766
Lakes Entrance	371 The Esp	Lakes Entrance		03 5155 5941
Langwarrin	230 Cranbourne-Frankston Road	Langwarrin		03 9776 7343
Lansell Square- Bendigo	267 High Street	Bendigo		03 5447 1181
Lara	48-50 The Centreway	Lara		03 5282 3919
Laurimar	95 Hazel Glen Drive	Laurimar		03 9717 2009
Lavington	351 Griffith Road	Lavington		02 6025 9795
Leongatha	Rear of McCartin St	Leongatha		03 5662 2677
Lilydale Marketplace	33 Hutchinson Street	Lilydale		03 9735 0333

Lucas	Dyson Drive	Ballarat		03 5334 2583
Lyttleton Tce - Bendigo	295 Lyttleton Tce	Bendigo		03 5441 8587
Macedon Plaza	325-327 Manningham Rd	Lower Templestowe		03 9850 4822
Malvern	-10 - 122 Wattletree Rd	Malvern		0412 896 411
Manor Lakes	455 Ballan Road	Manor Lakes		03 8731 7112
Meadow Mews	102 Hobart Rd	Kings Meadows		03 6344 1123
Mentone	55 Florence St	Mentone		03 9583 4154
Mernda Town Centre	1410 Plenty Road	Mernda		03 8679 3444
Mernda Village	59 Mernda Village Drive	Mernda		03 9717 9944
Mid Valley	Cnr Centre Valley Rd & Princes Dr	Morwell		03 5133 6044
Milleara Shopping Centre	Cnr Milleara Rd & Buckley St	East Keilor		03 9325 4000
Moonee Ponds	20 Homer St	Moonee Ponds		03 9370 0373
Mooroolbark	85 Brice Ave	Mooroolbark		03 9727 3722
Mordialloc Plaza	600 Main Street	Mordialloc		03 9587 6827
Mornington	78 Barkly St	Mornington		03 5977 0488
Mount Eliza	85 Mt Eliza Way	Mt Eliza		03 9775 2233
Mountain Gate	1880 Ferntree Gully Road	Ferntree Gully		03 8578 2715
Mowbray	262 Invermay Rd	Mowbray		03 6326 3411
New Town	1 Risdon Rd	Newtown		03 6228 2132
Newcomb	Cnr Wilsons Rd & Bellarine Hwy	Newcomb		03 5248 8011
Niddrie	383 Keilor Rd	Niddrie		03 9379 5331
North Balwyn	70C Doncaster Rd	North Balwyn		03 9859 3463
North Blackburn	Springfield Rd	Blackburn North		03 8393 0126
Northcote	Cnr High & Separation Sts	Northcote		03 9481 5792
Northland	2-50 Murray Rd	Preston East		03 9471 2777
Oakleigh	36 Hanover Street	Oakleigh		03 9568 5553
Oakleigh Links	1041 Centre Road	Oakleigh South		03 9563 7564
Ocean Grove	15 Park Lane	Ocean Grove		03 5256 1093
Ocean Grove Marketplace	Cn Kingston Downs & Shell Rds	Ocean Grove		03 5256 1094
Pakenham Marketplace-	50 - 54 John Street	Pakenham		03 8459 2811
Parkhill Junction Plaza	215-225 Parkhill Drive	Berwick		03 8790 1756

Patterson Lakes	Cnr Gladesville Blvd & Thompson Rd	Patterson Lakes		03 9773 2177
Plenty Valley	415 McDonalds Road	Mill Park		03 9404 3195
Point Cook	Cnr Main St & Murnong St	Point Cook		03 9395 8778
Port Melbourne	201 Bay St	Port Melbourne		03 9646 8266
Portland	98 Percy St	Portland		03 5523 4459
Prahran	325 Chapel Street	Prahran		03 9521 4025
Reservoir	289 Spring St	Reservoir		03 8459 2881
Ringwood North	204-206 Warrandyte Road	Ringwood North		03 9876 6069
Rivergum	538 Plenty Road	South Morang		03 7001 2615
Rosanna	111 Lower Plenty Rd	Rosanna		03 8459 1571
Rosebud Plaza	Boneo Rd & McCombe St	Rosebud		03 5986 5060
Rye	2185 Point Nepean Rd	Rye		03 5985 2123
Sale	37-39 Cunninghame St	Sale		03 5144 7979
Sanctuary Lakes	330 Point Cook Road	Point Cook		03 9395 3255
Sebastopol	42-54 Albert St	Sebastopol		03 5335 5460
Seymour	20 Tallarook St	Seymour		03 5792 4288
Shepparton City	39 Vaughan Street	Shepparton		03 5831 8007
Shepparton Marketplace	110 Benalla Road	Shepparton East		03 5822 2148
Shepparton Riverside	Shepparton South	Kialla		03 5823 5034
Showgrounds Village	320-380 Epsom Road	Ascot Vale		03 9376 0985
Somerville	49 Eramosa Rd West	Somerville		03 5977 9222
Southland - Coles	1239 Nepean Hwy	Cheltenham		03 95851896
St Helena	214 Aqueduct Rd	St Helena		03 9438 6585
Strath Village - Bendigo	134 Condon Street	Bendigo		03 5441 8339
Sunbury	2-24 Evans St	Sunbury		03 7002 6351
Sunshine Marketplace	80 Harvester Rd	Sunshine		03 9311 9759
Swan Hill	Beveridge Street	Swan Hill		03 5032 3009
The Dunes - Torquay North	97 Merrijig Drive	Torquay		03 7001 2618
The Glen	235 Springvale Road	Glen Waverley		03 9886 8021
The Pines	181 Reynolds Road	Doncaster East		0420 987 867
Thrift Park	171 Nepean Highway	Mentone		03 7025 8987

Tooronga	354 Tooronga Rd	Hawthorn East		03 9822 0094
Torquay	9-13 Gilbert St	Torquay		03 5215 1029
Traralgon	166/188 Franklin Street	Traralgon		03 5174 9038
Vermont	495 Burwood Hwy	Vermont South		03 9802 4590
Victoria Gardens	620 Victoria Street	Richmond		03 9427 8544
Wallan	81-89 High Street	Wallan		0431 837 655
Wantirna	348 Mountain Hwy	Wantirna		03 9738 0222
Warragul - Woolworths	56 Victoria St	Warragul		03 5623 6263
Warragul Coles	30-36 Palmerston St	Warragul		03 5622 2889
Warralily	Central Boulevard	Armstrong Creek		03 8459 1584
Warringal	56 Burgundy St	Heidelberg		03 9664 9034
Warrnambool - CBD	154 Koroit Street	Warrnambool		03 5561 5037
Warrnambool - Norfolk Plaza	743 Raglan Parade	Warrnambool		03 5560 5355
Warrnambool East	1 Gateway Road	Warrnambool		03 5561 1896
Watergardens	399 Melton Highway	Taylors Lakes		0493 526 915
Waurm Ponds	Colac Rd & Pioneer Rd	Grovedale		0410 628 557
Waverley Gardens	Jacksons Rd & Police Rd	Mulgrave		03 9574 6561
Wellington Village	1100 Wellington Road	Rowville		03 9764 4855
Wendouree	1209b Howitt St	Wendouree		03 5339 9173
Werribee Central	28 Station Pl	Werribee		03 9749 8858
Werribee Plaza	250 Heaths Road	Werribee		03 8080 1391
Wheeler's Hill	200 Jells Rd	Wheeler's Hill		03 8578 5553
Whittlesea	47 Church St	Whittlesea		03 9716 2488
Williamstown	32 Douglas Pde	Williamstown		03 9397 1718
Wonthaggi Plaza	2 Biggs Drive	Wonthaggi Plaza		03 5672 3834
Woodgrove	553-555 High St	Melton		03 9746 9960
Yarraville Coles	1-3 High St	Yarraville		03 9318 9699

WA

Bakery	Street Address	City	Franchisee Company	Bakery Principal	Bakery phone
Armadale	Jull St	Armadale			08 9399 8166

Baldivis	20 Settlers Avenue	Baldivis		08 9523 8454
Beaumaris - WA	Constellation Dr	Ocean Reef		08 8822 3114
Belmont Forum	227 Belmont Ave	Cloverdale		08 9478 4161
Booragoon	125 Riseley Street	Booragoon		08 9315 9440
Bunbury Forum	63 Sandridge Road	Bunbury		08 9711 1003
Bunbury Parks Centre	1 Brittain Road	Bunbury Parks Centre		08 9792 5166
Busselton	Cnr Prince & Stanley St	Busselton		08 9750 5735
Carousel	1382 Albany Highway	Cannington		08 6323 3133
Currambine	1244 Marmion Avenue	Currambine		08 9304 1137
Dalyellup	Norton Promenade	Dalyellup		08 9778 5960
Dianella	366 Grand Promenade	Dianella		08 9275 9775
Flinders Square	30 Wiluna Street	Yokine		08 9444 7899
Floreat Forum	Howtree Pl	Floreat		08 9284 0110
Forest Lakes	101 Forest Lakes Dr	Thornlie		08 9493 0922
Gateways	816 Beeliar Drive	Gateways		08 9499 1507
Geraldton	54 Sanford Rd	Geraldton		08 9921 5461
Greenwood - WA	Calectasia St	Greenwood		08 9448 4362
Halls Head	14 Guava Way	Halls Head		08 9586 1311
Hamilton Hill	8 Simms Road	Hamilton Hill		08 6363 5246
Harrisdale	Nicholson & Yellowwood Roads	Harrisdale		08 6594 1799
Haynes Shopping Centre	Cnr Armadale Rd & Eighth Rd	Haynes		08 9399 1760
Joondalup	420 Joondalup Drive	Joondalup		08 9300 3940
Kalamunda	39 Railway Road	Kalamunda		08 92931486
Karrinyup	200 Karrinyup Rd	Karrinyup		08 6363 5598
Kingsley	Kingsley Dr	Kingsley		08 9309 9566
Kingsway	168 Wanneroo Road	Madeley		08 9309 4297
Livingston Marketplace	100 Ranford Rd	Canning Vale		08 9456 5566
Mandurah Forum	Mandurah Forum SC	Mandurah		08 9581 5037
Meadow Springs	25 Meadow Springs Dr	Meadow Springs		08 9581 8362
Melville	380 Canning Highway	Bicton		08 6363 5237
Midland Gate	47 The Crescent	Midland		08 9274 7967

Morley	Collier St	Morley		08 9275 9605
Mosman Park	Monument St	Mosman Park		08 9385 6733
Mullaloo	11 Koorana Rd	Mullaloo		08 9307 4199
Myaree	65 North Lake Rd	Myaree		08 9317 6322
Noranda	58 Benara Rd	Noranda		08 9276 9396
North Perth	391 Fitzgerald St	North Perth		08 9227 9761
Ocean Keys	36 Ocean Keys Boulevard	Clarkson		08 9408 5022
Riverton	Cnr High Rd & Willeri Dr	Riverton		08 9457 2766
Rockingham	Read Street	Rockingham		08 9511 1026
South Fremantle	219 Hampton Road	South Fremantle		08 6311 8017
Southlands - WA	45 Burrendah Boulevard	Willetton		08 9310 6707
Subiaco	184 Rokeby Rd	Subiaco		08 9381 2917
Treendale	10 The Promenade	Australind		08 9778 5886
Waikiki	78 Charthouse Rd	Waikiki		08 9592 1251
Wanneroo	950 Wanneroo Road	Wanneroo		08 9306 4897
Warwick	643 Beach Road	Warwick		08 9448 8133
Wembley	Cnr Cambridge St & Jersey St	Wembley		08 9387 7725
Whitford	Whitfords Ave	Hillarys		08 6144 3200
Woodlands	84 Rosewood Ave	Woodlands		08 9204 5699
Woodvale	153 Trappers Drive	Woodvale		08 9409 6132