



15 November 2019

Mr Simon Bell
Australian Competition and Consumer Commission
23 Marcus Clarke Street
Canberra ACT 2601

By email: simon.bell@accc.gov.au

Dear Mr Bell

Bunnings Group Limited submission re: Resale Price Maintenance Notification RPN10000455 lodged by Stanley Black & Decker for Dewalt power tools, attachments and accessories
Your ref: RPN10000454

I refer to the Australian Competition and Consumer Commission's (ACCC) interested party consultation request dated 14 October 2019 regarding a notification by Stanley Black & Decker Australia Pty Ltd (SBD) to engage in resale price maintenance (RPM) for Dewalt power tools, attachments and accessories (Dewalt Products) (the Proposed Conduct).

Bunnings Group Limited (Bunnings) provides this submission setting out its views on the Proposed Conduct.

As a national retailer of Dewalt Products, Bunnings does not consider that any purported public benefit associated with the Proposed Conduct outweighs the obvious public detriment that will arise as a result of the Proposed Conduct. This public detriment includes:

- the reduction of intra-brand price competition for Dewalt Products;
- the likely requirement for end-customers to pay higher retail prices for Dewalt Products than they otherwise would in the absence of the Proposed Conduct; and
- lower incentives for retailers of Dewalt Products to invest in cost-saving initiatives.

Bunnings also considers that the purported public benefits of the Proposed Conduct identified in SBD's notification at section 3.5 (regarding non-authorized Dewalt Product dealers) and sections 5.15 - 5.16 (regarding increased customer awareness of dust management) are better addressed through other initiatives that do not involve the Proposed Conduct.

Further detail regarding Bunnings' reasons for this position are set out below.

1. Overview of Bunnings' power tools, attachments and accessories range

Bunnings' retail model

Bunnings is the leading retailer of home improvement and outdoor living products in Australia and New Zealand and a major supplier to project builders, commercial tradespeople and the housing industry. Operating from a network of large warehouse stores, smaller format stores, trade centres and frame and truss sites, Bunnings caters for consumer and commercial customers.

In 2019, Bunnings introduced a fully transactional website, allowing customers to 'click and collect' or 'click and deliver' products from Bunnings' standard and special-orders product range online.

Bunnings' revenue across the 2019 financial year totalled \$13.1 billion. As at 30 June 2019 there were a total of 377 trading locations made up of 267 warehouses, 75 smaller format stores and 32 trade centres, along with three frame and truss centres operating across Australia and New Zealand. At 30 June 2019, Bunnings employed over 44,000 team members.

Bunnings' power tools, attachments and accessories range

Bunnings sells a range of power tools, attachments and accessories through its warehouse, small format and trade centre retail outlets, as well as via its website. An indicative selection of Bunnings' power tools, attachments and accessories range is available to view on Bunnings' website at <https://www.bunnings.com.au/our-range/tools/power-tools>.

Consistent with its overarching 'widest range' strategy, and in recognition of Bunnings' intention of catering to both consumer and commercial customers, Bunnings offers customers a choice of products of various quality and price, approximately categorised in ascending order along an 'entry' – 'good' – 'better' – 'best' spectrum. Within the power tools, attachments and accessories category, Dewalt products fall within the higher-quality end of this spectrum. While the Dewalt Product range has internal variation in terms of price and quality, Bunnings considers that the most 'high-end' products with the Dewalt Product range occupy the 'better' and 'best' positions on the spectrum.

Bunnings' service model

Bunnings operates a 'self-service, mixed with best service' model, where customers are able to either browse and select their preferred products autonomously, or alternatively can seek the advice of team members if required.

Within Bunnings' retail outlets, Bunnings employs team members who are dedicated to, and specifically trained to work in, the tool shop area of its stores. Further details regarding Bunnings' approach to training its in-store team members who serve customers in the power tools, accessories and attachments category are set out at section 6 of this submission.

Bunnings' sales of trade quality tools

Bunnings has previously explained to the ACCC some of the constraints that Bunnings faces in meeting the expectations of its trade customers by offering a wide range of 'high end' trade-quality power tools to customers. These challenges include physical space constraints, lack of access to trade quality brands, a 'warehouse' perception amongst customers in certain categories and lack of after-sales product servicing.

Bunnings does not consider that price competition presents a barrier to Bunnings' ability to meet the needs of its trade or commercial customers.

2. Sales of Dewalt Products by Bunnings

An indicative range of Dewalt Products available from Bunnings is available for review on Bunnings' website at <https://www.bunnings.com.au/our-range/brands/d/dewalt>.

In FY2018/19, Bunnings' gross sales of Dewalt Products accounted for [c-i-c] [c-i-c] of Bunnings' overall sales in the power tools, accessories and attachments category.

Bunnings considers that the inclusion of Dewalt Products in its broader range of power tools, accessories and attachments is an important element of Bunnings being able to offer its customers a wide range of trade-quality products in this category.

3. Bunnings' pricing model

Bunnings' strategy over more than 25 years has been to deliver customers the 'lowest prices, widest range and best service'.

Consistent with the 'lowest prices' element of this strategy, and as previously explained to the ACCC, Bunnings invests significantly each year in initiatives, policies and procedures to monitor competitor pricing so that Bunnings does in fact deliver the lowest prices to customers.

Bunnings considers that its sustained investment in this regard has provided compelling value to customers and contributed to price-based competition in the power tools, accessories and attachments product category.

4. Dewalt Product pricing by Bunnings

Bunnings' approach to pricing with respect to Dewalt Products is consistent with its broader 'lowest prices' strategy. That is, Bunnings endeavours to set the lowest prices in the market, and pro-actively monitors competitor pricing (online and at competitor stores) to ensure that it continues to offer the lowest prices.

Between 1 January 2018 and 31 January 2019, Bunnings applied its 10% price guarantee to individual customers purchasing products supplied by SBD (which, importantly, is not limited to Dewalt Products, and includes products supplied by SBD under other brands such as 'Stanley', 'Stanley Fatmax', 'Black & Decker', 'Sidchrome', 'Irwin', 'Bostitch' and 'Lennox') on over [c-i-c] [c-i-c].

Between 1 January 2018 and November 2019, Bunnings has lowered (on either a temporary or permanent basis) its retail pricing on one or more Dewalt Products on over [c-i-c] [c-i-c].

The outcome of the above actions in each instance is that customers have been able to purchase Dewalt Products at a lower price than was previously offered by Bunnings, without any diminution in the level of customer service or product knowledge available to them.

5. Bunnings' strategies to reduce costs and retail pricing for Dewalt Products

Bunnings endeavours to manage product and range margin performance as part of a supplier's overall range, rather than on a strictly 'product by product' basis. This means that, while individual product margin is monitored and evaluated by Bunnings, Bunnings accepts that some products within a supplier's overall product range (and between different product categories) will inevitably generate higher and lower margins.

Bunnings has previously undertaken (or is presently undertaking) multiple measures to reduce product costs and therefore achieve sustainably lower retail price points on Dewalt Products. These include:

- sourcing Dewalt Products on a direct-import basis, whereby Bunnings imports the relevant Dewalt Product directly from its offshore country of production, saving costs associated with SBD's additional freight and in-store product replenishment costs;
- implementing different methods of in-store product replenishment and re-ordering to reduce the labour costs associated with placing Dewalt Product orders. This process involves automated re-ordering of Dewalt Products once a particular store's inventory hits a certain minimum level, as a replacement for SBD account managers needing to physically visit Bunnings' stores to manually survey stock levels and place orders accordingly (which in turn reduces the labour costs factored into SBD's product costs);
- implementing changes to product specifications (in terms of component cost, size, piece count, quantity) to reduce production costs. Such changes may include, for example, reducing the number of battery units provided with a particular cordless Dewalt power tool kit, so as to enable the kit to be sold at a lower price;

- purchasing certain Dewalt Products (including cordless hedge and line trimmers, cordless leaf blowers and chainsaws) on a 'no rebate' basis, enabling SBD to provide the product at a lower unit price;
- Bunnings committing to purchase particular Dewalt Products in large order quantities to take advantage of production cost savings by manufacturing in larger order runs; and
- Bunnings opportunistically purchasing a particular Dewalt Product that have been manufactured in a larger production run for other international retailers, allowing Bunnings to purchase products that have been manufactured at cheaper productions cost than would otherwise have been available.

6. Bunnings' investment in product training

Bunnings agrees with SBD's claim at sections 6.8 and 6.33 of SBD's notification regarding the Proposed Conduct that Bunnings is not a 'low service' retailer, and provides a significantly higher level of service than many other retailers (including online retailers).

Bunnings recognises the need for its store-based team members to have relevant product expertise when explaining the features and benefits of Dewalt Products, and power tools more generally. To this end, Bunnings invests heavily in providing training and education programs for its team members to develop their product expertise. Examples of such training include:

- Bunnings-operated 'Team Member Expo' events, which are large annual events in major cities whereby suppliers (including SBD) operate product information bays that Bunnings' team members can visit to learn about the SBD product range, features and innovations;
- Bunnings-operated 'Field Day' events, which are annual events in regional locations whereby suppliers (including SBD) operate product information bays that Bunnings' team members can visit to learn about the SBD product range, features and innovations;
- Bunnings team members attending external training courses with Dewalt Product experts;
- Bunnings team members attending Bunnings' 'Trade Expo' events to receive face-to-face product updates, demonstrations and training from suppliers, including SBD;
- Bunnings team members viewing and participating in 'live-stream' training events and courses provided jointly by SBD and Bunnings, which showcase the features, benefits and uses of Dewalt Products;
- SBD representatives attending Bunnings' retail stores to provide 'in-aisle' product training to Bunnings' in-store team members; and
- Bunnings-created internal merchandise bulletins explaining the features and benefits of new Dewalt Products or ranges.

Visual examples and further details of this training content are available at Appendix 1.

Bunnings has invested in this training and education as a means of offering the highest possible levels of customer service and product knowledge, and has done so without the support of any artificial measures, such as RPM, being in place to underpin the retail prices of Dewalt Products. Bunnings also notes in this regard that SBD has confirmed in section 6.12 of its notification that it does not charge its dealers of Dewalt Products for their participation in the extensive product training suite offered by SBD, and therefore considers that such training does not impose additional direct costs on such dealers that would justify the Proposed Conduct.

7. Concerns regarding the Proposed Conduct

The points of concern raised by SBD in its notification are, in Bunnings' view, evidence of an effective and efficiently functioning market which is likely to be adversely impacted if the Proposed Conduct is engaged in. This conduct risks distorting pricing and creates a disincentive for retailers to invest in initiatives that will make them more efficient and so lower their cost of supplying Dewalt Product and other professional grade power tools.

No public benefit in higher prices

Bunnings disagrees with SBD's assertion in the notification that public detriment from the Proposed Conduct, particularly in relation to any impact on competition, will be limited.

As the third largest market share power tools retailer, SBD's proposal to impose an effective floor price for Dewalt Products (at least in online and in print advertising) risks having the broader consequence of chilling price competition in the market for high-quality power tools, attachments and accessories.

Bunnings also notes SBD's concern about the claimed 'free rider' problem discussed in section 3.6 of its notification, by which customers visit specialist dealers in-store (and obtain the benefit of that dealer's high level of pre-sales service and advice) but then purchase the product from another lower-priced dealer online.

Irrespective of this claimed 'free rider' problem, Bunnings does not consider there to be any inherent public benefit in systemic prohibitions on advertising prices below a certain level. Bunnings considers that any such conduct of this nature deprives customers of price competition between retail channels. It also stands to prejudice customers who are unable to purchase Dewalt Products in-store (perhaps because they are geographically distant from a store or are time poor), as these customers will only be able to purchase Dewalt Products online or by ordering them at or above the MAP.

Further, Bunnings considers that the Proposed Conduct would deprive customers of the ability to self-select between paying a higher price in exchange for higher levels of pre-sales service or advice, or purchasing the same product online. In this regard, Bunnings notes that the public version of Dewalt's notification does not provide any evidence to suggest that so-called 'high-service' physical retailers do in fact offer Dewalt Products at higher prices than online competitors. In fact, and as set out in sections 3, 4 and 6 of this submission, Bunnings considers that it has been able to offer both sustained low prices and a good degree of product expertise simultaneously.

The Proposed Conduct will not address unauthorised reseller activity

SBD has noted at section 3.5 of its notification that it has observed non-authorized dealers, such as Audels, Supergrip and Melbourne Tool Company, who purchase Dewalt Products through 'non-authorized channels and advertise products at highly discounted prices'. SBD further claims that such non-authorized dealers 'often don't even carry the stock they are advertising, not to mention providing very little customer service'.

Bunnings considers that SBD's concerns regarding non-authorized dealers not holding sufficient stock to justify product advertising are best addressed through seeking the ACCC's intervention in such practices. Further, Bunnings does not consider that the imposition of market-wide minimum advertising prices via the Proposed Conduct will have any relevance to the conduct of these non-authorized dealers.

Other avenues to achieving product safety education

Bunnings agrees with SBD's claim at sections 5.15 and 5.16 of its notification that:

- it is important that the correct dust-extraction products are used to deal with dust issues arising on a job-site; and
- there are clearly significant public health benefits in ensuring that tradespeople are educated on dust issues for construction sites, dust extraction technology for their power tools and how to use their technology correctly.

However, Bunnings does not consider that the imposition of minimum advertised prices on Dewalt Products is an appropriate measure to ensure that such customer education outcomes are achieved. In this regard, Bunnings notes that it is open for SBD to achieve these customer education outcomes through offer instructional manuals and guidance in product packaging, online instructional videos, or

in-store product demonstrations through existing retail channels. These activities do not require any specification of minimum advertising prices for Dewalt Products, yet still contribute to achieving SBD's stated intention of ensuring customer education in dust management issues.

Price competition not a barrier to product displays or customer service

Bunnings agrees with SBD's claim at section 6.7 of its notification that it is important that retailers:

- carry a range of Dewalt Products in sufficient stock quantities and with adequate display space; and
- offer knowledgeable sales persons in-store to explain the specific features of Dewalt Products.

As noted in section 6 of this submission, Bunnings has invested in product training initiatives to allow its team members to better explain the features and benefits of Dewalt Products (as well as other products in the power tool, attachments and accessories product category). This investment has been achieved without the support of any resale price maintenance, and has resulted in overall higher service levels and lower prices for customers of Dewalt Products.

Based on this experience, Bunnings therefore does not consider that price competition presents a barrier to retailers electing to invest in product training for in-store team members, and therefore does not consider that the Proposed Conduct is necessary to justify similar investments being made by other retailers.

Proposed Conduct reduces incentive for innovation by retailers

As noted in section 5 of this submission, Bunnings has pursued several new innovative initiatives with the intent of lowering its procurement costs for Dewalt Products, which have in-turn allowed Bunnings to sustainably offer low prices on Dewalt Products.

Such innovation initiatives were invested in by Bunnings out of a need to lower procurement costs in order to remain price competitive on Dewalt Products. Similar initiatives are available to specialist tool retailers if they choose to adopt them.

Bunnings considers that the incentive for retailers to invest in such cost-reducing initiatives will be significantly reduced if the Proposed Conduct were to be adopted, on the basis that retailers would likely be subject to lower levels of intra-brand price competition.

Inter-brand price competition is incrementally less relevant with each new RPM notification

Bunnings has observed that since the *Competition and Consumer Act 2010* (Cth) was amended in November 2017 to permit notification of resale price maintenance:

- the ACCC allowed the RPM notification by Tooltechnic Systems (Aust) Pty Ltd (RPM20181) to stand in respect of the Festool and Fein power tool brands (which are direct competitors with the Dewalt Products) (the **Tooltechnic notification**); and
- the ACCC is currently considering the RPM notification lodged by JWL Marketing Pty Ltd t/a Weldclass Welding Products (RPN10000454) in relation to welding and plasma cutting products (the **Weldclass notification**).

In its statement of reasons for allowing the Tooltechnic notification to stand, the ACCC observed the relatively 'low market shares' and impact of 'numerous competitors' as relevant factors in the ACCC's decision. Further, the ACCC noted that Festool and Fein were 'niche, low volume brands' and that 'RPM conduct is not prevalent amongst other power tool suppliers in Australia'.

Bunnings notes SBD's claim at section 7.4 of its notification that 'SBD is the third largest supplier of power tools and the third largest supplier of professional power tools through its DEWALT brand'. In light of this claim, and the existence of the Tooltechnic notification and the Weldclass RPM notification, Bunnings considers that it is therefore not appropriate for the SBD notification to be:

- considered against the same 'niche, low volume' criteria accepted by the ACCC in allowing the Tooltechnic RPM notification to stand; or
- assessed against a broader market where 'RPM conduct is not prevalent amongst other power tool suppliers in Australia' (on the basis that such conduct is now in fact prevalent).

We trust that the information provided in this submission assists the ACCC in its consideration of SBD's notification. If you have any further queries in relation to this submission, please contact Kieran Chute [c-i-c] [c-i-c].

Yours sincerely



Phil Bishop
General Manager – Merchandising
Bunnings Group Limited

Appendix 1 – Bunnings team member training initiatives

1. Bunnings Team Member Expo

- historically run annually in WA, VIC, NSW and QLD
- includes displays and demonstrations of Dewalt Products
- open to Bunnings team members



2. Field Day event

- historically run annually in all states
- includes displays and demonstrations of Dewalt Products
- open to Bunnings' team members

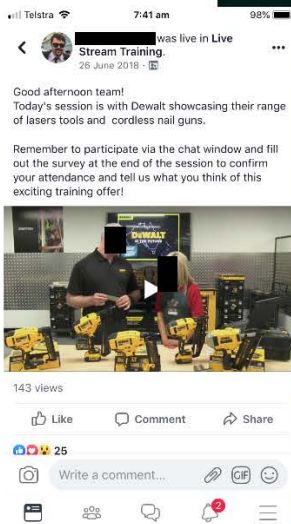


3. Trade Expos

- historically run annually in all states
- open to Bunnings' team members and the general public
- Bunnings' trade sales team invited to attend prior to the event being opened to the general public, to receive training and updates on Dewalt Products



4. Live streaming training



5. Bunnings' merchandise bulletins to store teams

Merchandise Bulletin



	General	Action
Dept:	Power Tools	
Who:	Building Materials Sales & Service Coordinators Tool Shop Team Members	
What:	Dewalt 18V Nail Guns	
Action By:	July 2018	
From:	[Redacted] - Power Tools Buyer	
For further information call Team Assist on 1800 101 111		No:1129/18 Date:26/06/2018

New Dewalt 18V Nail Guns

New Nail Guns are now available from Dewalt (details below). Which we will be rolling out to stores with 2 and 3 Bays of Dewalt. Initial stocks have been allocated to stores.



FINELINE	2 SPEED FRAMING NAILER KIT DCN682 DCN682	15GA DA BRADDER DCN650 DCN650	18GA SECOND FIX DCN660 DCN660	18GA C-1 BRADDER DCN680 DCN680	18GA 'SX' STAPLER DCN661 DCN661
APPLICATIONS	FRAMING • Wall studs • Roofing • Joist installation • Floor boards • Decking and fencing • Cladding	SECOND FIX • Where high holding power is required • Interior installation • Cornice • Skirting • Door & window • Resisting cabinetry	SECOND FIX • Interior installation • Skirting • Door & Window • Fencing • Gateway	SECOND FIX • For fine finish work • Cabinetry • Fine Skirting • Door & Window	STAPLING • Wires / mesh to timber • Furniture and case back • Fence and trails • Animal enclosures
SPECIFICATIONS					
Nail Diameter	2.8 - 3.3	1.8 (15 GA)	1.8 (18 GA)	1.25 (18 GA)	1.25 (18 GA) STAPLE CROWN
Nail Length (mm)	50 - 80	32 - 63	32 - 63	15 - 54	12 - 38
Nail Gauge	30-34"	34"	30"	8"	17"
Weight Rate (int kg)	4.1	2.9	2.35	2.6	2.6

Products

Item Number	Item Description	Item Status	Item Grade	Supplier	Retail	Allocation Number
0045826	NAILER FINISHING C/LESS DEWALT++18V 18GA N/CROWN DCN681N-XJ	Promo (will change to Live)	B	Stanley Black & Decker	\$529.00	810303
0045825	NAILER FINISHING C/LESS DEWALT++18V 18GA BRAD BARE DCN680N-XJ	Promo (will change to Live)	B	Stanley Black & Decker	\$599.00	810301
0045827	NAILER FINISHING C/LESS DEWALT++18V 15GA ANGLD BARE DCN650N-XJ	Promo (will change to Live)	B	Stanley Black & Decker	\$599.00	810302

Actions

- When stock arrives in store please set aside in a safe location – we'd suggest putting them into hand stock inside tool shop until a Dewalt representative calls on your store to set them up in the bay.
- On their calls the Dewalt representatives will make minor updates to their 18v bays to accommodate these into the layouts and will setup a display unit with security swage (Dewalt representatives have been given enough cables to complete this in stores).
- Dewalt is currently creating tear off pads for stores/customers, when available these can be located on the product or relevant bay.

<input checked="" type="checkbox"/> NATIONAL	<input type="checkbox"/> VIC	<input type="checkbox"/> SA / NT / TAS	<input type="checkbox"/> NSW / ACT	<input type="checkbox"/> QLD / FNQ	<input type="checkbox"/> WA
<input checked="" type="checkbox"/> ALL STORES	<input type="checkbox"/> W / HOUSES	<input type="checkbox"/> SMALL FORMAT	<input type="checkbox"/> TRADE		<input type="checkbox"/> SELECTED STORES

Merchandise Bulletin



	New Range	Info
Dept:	Hand Tools	
Who:	Building Materials Sales & Service Coordinators Tool Shop Team Members	
What:	New DeWalt Laser Range	
Action By:	Now	
From:	[REDACTED] – Buyer Hand Tools	
For further information call Team Assist on 1800 101 111		No:0836/18 Date: 15/05/2018

New DeWalt Laser Range

Your store will soon be receiving an initial allocation of an exciting new range of laser levels from DeWalt.

These lasers come in both Green and Red beam options and are the ideal compact laser for any job at home or on the jobsite.

With all the features you would expect from DeWalt such as Dust and Water protection (IP54 rating) and tough yet compact design, these lasers are sure to be a great success!

Keep an eye out for a strong marketing program across the Tax time and a representative from Stanley Black and Decker will be in store shortly to assist with merchandising.

In the meantime, please refer to the Laser Measuring BLG if you need any further information.

Products						
Item Number	Item Description	Item Status	Item Grade	Supplier	Retail	Allocation Number
0043784	LEVEL LASER DEWALT++RED CROSS LINE DW08802-XJ	Live	A	STANLEY BLACK & DECKER	\$99.00	182329
0043785	LEVEL LASER DEWALT++GREEN CROSS LINE DW08802CG-XJ	Live	A	STANLEY BLACK & DECKER	\$149.00	182329
0043786	LEVEL LASER DEWALT++360 RED DW03601-XJ	Live	A	STANLEY BLACK & DECKER	\$189.00	182329
0043787	LEVEL LASER DEWALT++360 GREEN DW03601CG-XJ	Live	A	STANLEY BLACK & DECKER	\$239.00	182329

Actions/Information

- New DeWalt Compact Lasers in store soon.

<input checked="" type="checkbox"/> NATIONAL	<input type="checkbox"/> VIC	<input type="checkbox"/> SA / NT / TAS	<input type="checkbox"/> NSW / ACT	<input type="checkbox"/> QLD / FNQ	<input type="checkbox"/> WA
<input type="checkbox"/> ALL STORES	<input checked="" type="checkbox"/> W / HOUSES	<input type="checkbox"/> SMALL FORMAT	<input type="checkbox"/> TRADE		<input type="checkbox"/> SELECTED STORES

Merchandise Bulletin



	New Product	Action
Dept:	Power Tools	
Who:	Building Materials Sales & Service Coordinators Tool Shop Team Members	
What:	Dewalt Flexvolt Heavy Duty 5pce Kit	
Why:	Promotional Kit (IN: 6260453)	
When By:	Now	
From:	[REDACTED] - National Buyer Power Tools	
For further information call Team Assist on 1800 101 111		No:1750/17 Date:10/10/2017

In the coming days, you will receive a promotional allocation (Alloc number: 308040) of this product. Can you please ensure the product is merchandised in a prominent location adjacent/near the Tool Shop register?

You may also notice some marketing material in competitor catalogues / online that mentions a 5.0Ah battery free by redemption – which customers then need to go and register online to receive.

The kit we have allocated to stores already has the 5.0Ah battery included in it (no need for customer to do anything further).

Kit features;

- Heavy duty brushless hammer drill (DCD996)
- Heavy duty brushless 3 speed impact driver (DCF887)
- Flexvolt 7 1/4" Circular saw
- Flexvolt 125mm Grinder
- Flexvolt Recip saw
- 2x Flexvolt 6.0Ah batteries
- 1x 18v 5.0Ah battery
- 1x Charger
- 2x Tough box



Item Number	Item Description	Item Status	Item Grade	Supplier	Retail	Alloc Number
6260453	COMBO KIT CORDLESS DEWALT++18V LI 5 PCE W/6.0AH	Promo	A	Stanley Black & Decker	\$1,499.00	308040

<input checked="" type="checkbox"/> NATIONAL	<input type="checkbox"/> VIC	<input type="checkbox"/> SA / NT / TAS	<input type="checkbox"/> NSW / ACT	<input type="checkbox"/> QLD / FNQ	<input type="checkbox"/> WA
<input checked="" type="checkbox"/> ALL STORES	<input type="checkbox"/> W / HOUSES	<input type="checkbox"/> SMALL FORMAT	<input type="checkbox"/> TRADE	<input type="checkbox"/> SELECTED STORES	