

From: Ruchi Bhatt <Ruchi.Bhatt@aigroup.com.au>
Sent: Friday, 15 May 2020 1:08 PM
To: Chambers - Ross J <Chambers.Ross.j@fwc.gov.au>
Cc: Brent Ferguson <Brent.Ferguson@aigroup.com.au>; AMOD <AMOD@fwc.gov.au>
Subject: AM2020/20 Application to vary the Fast Food Industry Award 2010 - Ai Group Submission regarding the Evidence of Joshua Cullinan

Dear Associates,

I refer to the above matter.

Please find **attached** a further submission of the Australian Industry Group.

We will shortly provide a copy of the attached to representatives of the SDA, ACTU, Commonwealth and RAFFWU. Given that the submission relates to Mr Cullinan's evidence, we propose to serve a copy of the attached on counsel appearing for RAFFWU only.

Yours sincerely,

Ruchi Bhatt
Senior Adviser – Workplace Relations Policy



51 Walker Street, North Sydney NSW 2060
T: 02 9466 5513
M: 0400 395 348
E: ruchi.bhatt@aigroup.com.au
www.aigroup.com.au



AM2020/20 Application to vary the Fast Food Industry Award 2010

Evidence of Joshua Cullinan – Ai Group Submission (15 May 2020)

Ai Group submits that the following aspects of Joshua Cullinan’s witness statement of 14 May 2020 should be attributed little if any weight given the nature of the evidence, as identified below.

Paragraph 10	Basis for extrapolation not made out.
Paragraph 13, penultimate sentence, “purportedly”.	Opinion. Argumentative.
Paragraph 13, last sentence.	Opinion. Submission.
Paragraph 15.	Hearsay. Particularly prejudicial because potentially second-hand hearsay (or more removed) and source not identified.
Paragraph 15, second sentence.	Opinion without proper basis.
Paragraph 16, second sentence including paragraphs (a) – (h).	Hearsay. Particularly prejudicial because potentially second-hand hearsay (or more removed) and source not identified.
Paragraph 18, first sentence.	Opinion / Speculation without proper basis.
18, second sentence, “and also as a result of the direct contacts that I had with workers in the period I describe above.”	Hearsay. Particularly prejudicial because source not identified.
Paragraph 21, save for first sentence.	Hearsay. Particularly prejudicial because source not identified. Opinion and speculation of unidentified source, without a proper basis.
Paragraph 22.	Hearsay. Particularly prejudicial because source not identified. Opinion and speculation of unidentified source, without a proper basis.
Paragraph 28, second and third sentence.	Hearsay. Particularly prejudicial because source not identified.
Paragraph 29, final sentence and extract from Commission decision.	Submission.
Paragraph 30.	Opinion without proper basis.
Paragraph 31.	Opinion without proper basis.
Paragraph 33, final sentence.	Opinion. Submission.
Paragraph 34.	Opinion. Submission.
Paragraph 35, first sentence.	Opinion. Submission.
Paragraph 37, final sentence.	Hearsay. Particularly prejudicial because source not identified.
Paragraph 38, first sentence.	Opinion without proper basis. Hearsay. Particularly prejudicial because source not identified.
39, final sentence.	Opinion / Speculation without proper basis.