



AUSTRALIAN CHAMBER OF
COMMERCE AND INDUSTRY

ACCI SUBMISSION

Australian Law Reform Commission

Grey Areas – Age Barriers to Work in
Commonwealth Law – Discussion Paper 78

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1. ABOUT ACCI

1.1 Who We Are

The Australian Chamber of Commerce and Industry (ACCI) speaks on behalf of Australian business at a national and international level.

Australia's largest and most representative business advocate, ACCI develops and advocates policies that are in the best interests of Australian business, economy and community.

We achieve this through the collaborative action of our national member network which comprises:

- All state and territory chambers of commerce
- 29 national industry associations
- Bilateral and multilateral business organisations

In this way, ACCI provides leadership for more than 350,000 businesses which:

- Operate in all industry sectors
- Includes small, medium and large businesses
- Are located throughout metropolitan and regional Australia

1.2 What We Do

ACCI takes a leading role in advocating the views of Australian business to public policy decision makers and influencers including:

- Federal Government Ministers & Shadow Ministers
- Federal Parliamentarians
- Policy Advisors
- Commonwealth Public Servants
- Regulatory Authorities
- Federal Government Agencies

Our objective is to ensure that the voice of Australian businesses is heard, whether they are one of the top 100 Australian companies or a small sole trader.

Our specific activities include:

- Representation and advocacy to Governments, parliaments, tribunals and policy makers both domestically and internationally;
- Business representation on a range of statutory and business boards and committees;
- Representing business in national forums including Fair Work Australia, Safe Work Australia and many other bodies associated with economics, taxation, sustainability, small business, superannuation, employment, education and training, migration, trade, workplace relations and occupational health and safety;
- Representing business in international and global forums including the International Labour Organisation, International Organisation of Employers, International Chamber of Commerce, Business and Industry Advisory Committee to the Organisation for Economic Co-operation and Development, Confederation of Asia-Pacific Chambers of Commerce and Industry and Confederation of Asia-Pacific Employers;
- Research and policy development on issues concerning Australian business;
- The publication of leading business surveys and other information products; and
- Providing forums for collective discussion amongst businesses on matters of law and policy.

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2. INTRODUCTION

1. ACCI welcomes the opportunity to provide a further written submission in response to the ALRC's Discussion Paper (DP 78).
2. That submission emphasised that the focus of the ALRC's inquiry should be directed to removing disincentives, barriers and impediments to improve the workforce participation of older workers. The Inquiry will be a missed opportunity if it ultimately recommends the creation of new barriers or disincentives in the form of new or higher regulation, red tape or costs on business. The terms of reference are clear: what changes, if any, could be made to relevant Commonwealth legislation and legal frameworks to remove identified barriers.¹ This further submission addresses the ALRC's proposals and questions with specific reference to the ALRC's terms of reference.
3. A key theme that has not been explored in depth is the approach adopted in the ACCI policy statement "*Employ Outside the Box – the Rewards of a Diverse Workforce*" in seeking to address expected skills and workforce shortages. It is accepted by the community that there will be a need to rely increasingly on the underemployed cohorts of the population to meet the needs of industry and commerce. The need for retention of skills and experience in the workforce is of increasing importance. Maintaining or increasing productivity is also a key theme.
4. It therefore goes beyond seeking to attract 'willing' and 'available' older workers back into the productive workforce. Those former workers that are or have been comfortably retired for some time may be suitable candidates for a return to employment if relevant (Commonwealth law) impediments are removed. There are significant economic benefits to be gained from retaining older employees in the workforce for additional periods of three to five years. These people are more likely to be influenced or affected by the impact of Commonwealth laws, a large number of which appear to have been enacted for taxation/financial purposes.

¹ Terms of reference.

5. However, the ALRC's proposals, recommendations and questions are counter-intuitive to the overriding and important task of the ALRC – that of not creating new impediments on those that seek to employ or engage older workers – the employer community.

3. KEY ISSUES

Characteristics of Small Businesses

6. ACCI has attempted to provide additional relevant information on the characteristics of small businesses who may be impacted by a number of recommendations in order to illustrate that general recommendations has the potential to disproportionately impact smaller firms which do not have the same resources as larger firms.
7. According to the ABS latest data, as at June 2011, there were 826,389 (38.8%) employing businesses and 1,306,023 (61.2%) non-employing businesses. Of the employing businesses, 739,312 (89.5%) employed less than 20 employees.²
8. A recent survey on family businesses in Australia found that the 82.7% of respondents indicate that they consider their business to be a family business. The majority of family firms, 63.6% (68.6%), are small (1-19 employees); 32.2% (25.5%) are medium (20-199 employees); and 4.1% (5.9%) are large (200 or more employees) businesses. The median number of employees in family businesses is 12.8 (10.5).³
9. A publication titled "*Key statistics on small business*" is published by the Industry Policy and Economic Analysis Branch in the Industry and Small Business Policy Division of the Department of Innovation, Industry, Science and Research.⁴

² ABS Cat. 8165.0 - Counts of Australian Businesses, including Entries and Exits , Jun 2007 to Jun 2011, released 31 January 2012.

³ The MGI Australian Family and Private Business Survey, July 2010
<http://peak.fambiz.org.au/documents/item/251> p.13

⁴ Available here:
<http://www.innovation.gov.au/SmallBusiness/KeyFacts/Documents/SmallBusinessPublication.pdf>

10. Table 4 of that publication is extracted below and illustrates that small businesses are concentrated in services sub-sectors such as retail trade (92.2%), and accommodation/food services (82.9%).⁵

Table 4: Small business numbers within the services sector, June 2009

Services subsectors	Number of businesses	Number of small businesses	Small business share of services subsector (%)
Construction	341 618	333 744	97.7
Professional, scientific and technical services	231 465	224 257	96.9
Rental, hiring and real estate services	217 464	214 050	98.4
Financial and insurance services	149 645	147 302	98.4
Transport, postal and warehousing	133 263	129 775	97.4
Retail trade	139 609	128 678	92.2
Health care and social assistance	92 395	87 700	94.9
Other services	85 476	82 978	97.1
Administrative and support services	76 561	70 414	92.0
Wholesale trade	76 302	70 363	92.2
Accommodation and food services	77 111	63 930	82.9
Arts and recreation services	27 496	26 026	94.7
Education and training	23 551	21 622	91.8
Information media and telecommunications	17 986	16 873	93.8
Public administration and safety	8053	7147	88.7
Electricity, gas, water and waste services	5569	5119	91.9
TOTAL SERVICES	1 703 564	1 629 978	95.7

Data source: ABS Cat. No. 8165.0, datacube 9.

11. As at August 2006, 19.2 per cent of small business operators earned a gross weekly income of between \$400 and \$599. This was followed by 15.2 per cent of small business operators who earned a gross weekly income of between \$600 and \$799. A total of 1.5 per cent of small business operators earned a negative or nil gross weekly income and 3.0 per cent of small business operators earned a gross weekly income of between \$1 and \$149.⁶

⁵ Ibid, p.10.

⁶ Ibid, Table 9, p.23.

12. Small business employ 45.5 per cent of all award reliant employees. Of the 1.36 million employees paid according to awards, 619,800 were employed by small businesses.⁷
13. The ALRC should note that employer organisations are taking the lead in seeking to encourage employers to consider flexible working arrangements as one key criterion designed to encourage/enable mature age employees to return to or remain in work. However, without substantive changes to the *Fair Work Act 2009* including amendments make Individual Flexibility Arrangements (IFAs) workable there will remain little incentives for employers to enter into IFAs. It is disappointing that the ALRC has recommended changes to the right to request provisions of the FW Act, yet did not recommend or support changes to the IFA which the Government's own independent Post Implementation Review Panel recommended.
14. The DP provides a good starting point to considering a diverse range of existing laws, regulations and issues affecting workforce participation. The ALRC has a significant opportunity to consider the representative voices of industry who which ultimately must make crucial employment decisions. Whilst ACCI encourages all businesses to consider hiring a diversity of workers and consider within its own workforce ways to retain important workers, the ALRC should instill confidence in businesses and not recommend proposals which will do or have the potential to create the very opposite.
15. ACCI reiterates its views and recommendations in its submission to the ALRC. ACCI has constructively engaged with the ALRC's draft recommendations and questions below. These responses are provided without prejudice to ACCI or its members' further consideration.

ACCI Response to Specific Recommendations

Chapter 2: Recruitment and Employment Law

⁷ ABS Cat. No. 6306.0.

Proposal 2-1

16. The Consultative Forum on Mature Age Participation made three recommendations on the need for the recruitment industry to 'lift its game' in relation to mature age workers. Some elements of the recruitment industry have levied the blame on industry (employers) as being responsible for giving instructions not to refer older applicants. Industry associations should address these concerns with employers to determine whether changes in attitudes and practices are warranted. Perhaps the FWO could have a role in seeking to change practices adopted by recruiters. Certainly many older job seekers retain the perception that the recruiters are exercising forms of age discrimination in failing to give adequate recognition of the merits of their applications or provide reasons for the employer's decision.
17. ACCI supports further education initiatives that are provided in collaboration with relevant industry associations.

Proposal 2-5

18. ACCI has previously indicated its objection to this proposal which is noted at [2.62] of the DP. This proposal would extend to all employees who have "*caring responsibilities*" – it is not restricted to mature age workers and arguably falls outside of the ALRC's Terms of Reference, thus could have an unintended broader effect on employers. Currently, there are already new protections for employees under s.351 of the *Fair Work Act 2009* (FW Act) which prohibits a person taking adverse action against an employee (or prospective employee) because of that employee's "*family or carer's responsibilities*". The proposal would allow virtually any employee to make a request, thus triggering obligations upon the employer, as any employee (regardless of age) would be able to point to some form of "*caring responsibility*", which has no relevance to them as a mature age or older worker, nor any relevance to the entity which requires care.

19. ACCI believes that employers and employees at the enterprise level are best placed to know what arrangements work best for them. As ACCI indicated in previous submissions, there remains no legal impediment to an employee requesting changes to their working arrangements – they do not need s.65 to allow them to make that request. Whilst the ALRC has recommended this change, it remains puzzling why there is no recognition of the need to amend the existing Individual Flexibility Arrangement provisions of the FW Act which would actually assist in implementing a request made pursuant to s.65. The Fair Work Review Panel made a number of recommendations to encourage IFA making.⁸ The ALRC at [2.72] only “notes” the Panel’s recommendations in this regard, instead of supporting a change to those propositions, as recommended by the Panel. This is regrettable and without change will mean employers will be reluctant to agree to changes in work without a corresponding mechanisms to enter into IFA to implement the accepted changes to working arrangements (recalling that IFAs are voluntary and subject to the Better off Overall Test).

Proposal 2–6

20. ACCI is not opposed to the FWO producing guidance material in consultation with industry. It appears that such a guide is not required as the FWO already has a best practice guide on these issues.

Question 2–1

21. Experience gained from participating in the pilot of the Corporate Champions project revealed the value of providing mechanisms to enable mature age workers to identify their preferences for pre & post retirement arrangements so that they have a better understanding of their needs for flexible working arrangements. ACCI continues to encourage employers to review workplace conditions and roles as a means of encouraging valuable skilled/experienced mature age employees to remain at work or

⁸ For example, see Panel recommendations 9 & 12.

to return to work. As mentioned above each industry sector could be tasked with developing solutions relevant to their modes of operation since a single model will not be suitable for all circumstances.

Proposal 2-7

22. ACCI and its members will consider this proposal in the context of the four yearly review.

Proposal 2-8

23. ACCI opposes this recommendation on the basis that:
- It is contrary to the terms of reference.
 - It is contrary to the recommendations of the Government's own independent PIR of the FW Act. There was no specific recommendation to amend these provisions, despite submissions that sought to amend the NES.
 - The ALRC ignores the fact (or does not refer to the fact) that the current provisions reflect the Australian Industrial Relations Commission test case decision in 1984 which was the subject of extensive and contested proceedings.⁹ The AIRC ruled on standard clause which has remained in its current form in the FW Act. The only "evidence" that the ALRC appears to cite to justify increased labour costs to all employers is an ABS survey. The ALRC states its proposal is in "*order to provide incentives for employers to retain mature age workers ...*".¹⁰ It is puzzling to industry as to how the ALRC concludes that by somehow increasing employer labour costs will provide "*an incentive*" to retain mature age workers. In any event, ACCI opposes this recommendation given the lack of evidence to justify it and the unintended consequences would outweigh any perceived benefit.

Proposal 2-9

⁹ (1984) 8 IR 34; Moore J, President, Maddern J Deputy President and Brown Commissioner, Decision issued 2 August 1984, Print F6230.

¹⁰ At [2.85].

24. A generic approach may not be of significant value to professional associations and industry representation groups as differing health and safety requirements may impact on the licensing or relicensing of older workers. The proposal may contribute to broader consideration of capacity-based requirements but specific consultation is required with each group.

Proposal 2-12

25. ACCI supports further education and awareness initiatives to aid in increasing workforce participation of mature age persons.

Question 2-3

26. ACCI is strongly opposed to the creation of a body or reporting framework which would require mandatory reporting obligations – this would only lead to increased red-tape and compliance burdens on firms with little, if any, positive benefits. This is contrary to the Terms of Reference as the question (which has a proposal embedded within it) is not one which seeks to remove existing barriers in Commonwealth laws. Further, it is unclear why an employer would be required to report on the number of “*mature age workers*” and how a regulatory reporting regime impact the participation or otherwise of mature age workers?

Chapter 3 - Work Health and Safety and Workers' Compensation

Proposal 3-1

27. Under the WHS legislation duty holders must ensure, so far as is reasonably practicable, the health and safety of workers engaged in work for the business or undertaking. This duty is owed to all workers including volunteer workers.
28. There is no need for future work plans or undertakings in this area. The Strategy already includes:

Action Areas: healthy and safe by design

Hazards are eliminated or minimised by design includes allowing for all workers

Action Area: health and safety capabilities

Everyone in the workplace has the work health and safety capabilities they require

Education training and advice providers have the appropriate capabilities

Skills development is integrated into education and training programmes

Action Area: leadership and culture

Leaders in communities and organisations promote a positive culture for health and safety. E.g. Organisation leaders foster a culture of consultation, collaboration which actively improves WHS

Action Area: research and evaluation

Evidence –informed policy, programmes and practice, evidence translated to assist practical applications, for prioritising and progressing areas of national interest

Action Area: Government

WHS is actively considered in government policy and set a good example WHS practices

Action Area: Responsive and Effective Regulatory Framework

Regulation should allow flexibility in changing circumstances, monitored and reviewed to be responsive and effective.

Despite the growth in numbers working beyond 65 (over the past 10 years the numbers working beyond 65 have grown.

Proposal 3–2

29. ACCI supports informed and evidence based policy decisions. ACCI is actively involved in the Research arm of SWA. Reporting on this issue currently exists via worker’s compensation data and

could be used to inform decisions without undertaking specific new projects.

30. ACCI suggests that there is a real risk if this area is made more complex. The more complex this is made the greater resistance will be.
31. Any research should result in objective data about the real risks and the real advantages/benefits.

Proposal 3-3

32. Guidance currently exists for all workers.
33. ACCI recommends that the focus should remain on the positives of employing those with experience. This age group can be a low risk with a high reward. Materials to support this in the workplace could be helpful. Industry could also support materials to raise awareness for the targeted age group to ensure that they consider themselves as workers.
34. ACCI does not believe this requires undertaking specific new projects.
35. ACCI suggests that there is a real risk if this area is made more complex. The more complex this is made the greater the resistance.

Proposal 3-4

36. The Awards process recognises any innovation that supports young, old or any worker. A single category for aged workers raises the question of targeting each and every individual category possible.
37. ACCI recommend ensuring that the current wording in the Award process recognises this application – “any innovation that supports any practice or any age group or any individual category”

Proposal 3-5

38. ACCI supports a consistent application within the commonwealth systems.

Proposal 3-6

39. ACCI supports a consistent application within the commonwealth systems.

Please note: there is a slight technical amendment currently being considered in new NSW legislation as an unintended error on normal retirement age and benefits.

2 years seems to be a fairly common time limit.

Question 3-1

40. ACCI does not support the proposal to extend the time limit.
41. Extending the time limit for impairment payments will result in an increase in workers compensation premiums and that is what will tend to drive employment decisions particularly for those employers who have had a mature worker claim and whose premiums are direct claims cost affected (a minority of employers but the employers of a significant part of the workforce and of a size which may be best able to accommodate older workers.
42. ACCI caution that any extension to these payments will be counter-productive.

Question 3-2

43. ACCI does not support the proposal.
44. SafeWork Australia has a tripartite Strategic Issues Group that considers Worker's Compensation. At a recent meeting members noted that such a payment will only open up the field for more disputation.
45. The Tasmanian provision is specific in that it requires three conditions to be met and on which the tribunal has to be satisfied - the terms of employment permitted employment beyond age 65 **AND** the worker intended to work beyond age 65 but for the injury **AND** the incapacity will continue beyond age (S87 WRC Act 1988). The tribunal can determine if payments go beyond age 65 and for what period. The Act came into force in 1988 and is clearly intended to deal with the exception rather than the rule. Austlii shows only 2 cases relating to the Tas S87 since 2004. The

other variables of course are the adoption of the pension entitlement age as the definition of retirement age - that will of itself lift the cut-off date and the push for at least a two year limit on incapacity payments for injuries occurring post retirement age or those that occur within two years of retirement age.

46. This discretion should remain and is best placed at this level.
47. A supplementary payment could impede the supply of job opportunities at a time when 'retirement age' is of increasing less relevance and increasing numbers of people may well be able to show an entitlement to continue employment beyond normal retirement age.
48. Eligibility for workers compensation coverage for those working beyond retirement age – albeit time limited adequately address the matters covered by s87. S87 came about at another time and in a significantly different environment with respect to people working beyond normal retirement age and other changes some of which are already in place for a number of jurisdictions and are likely to be recommended for others (retirement age tied pension eligibility age). Therefore ACCI does not support this proposal.

Proposal 3-7

49. ACCI does not support the proposal.
50. Under the WHS legislation duty holders must ensure, so far as is reasonably practicable, the health and safety of workers engaged in work for the business or undertaking. This duty is owed to all workers including volunteer workers.
51. There is no need for future work plans or undertakings in this area.

Question 3-3

52. ACCI does not support the proposal.

In general

53. There are two dimensions to disincentives affecting the employment of older workers. Those perceived by the workers i.e. what will stop them offering themselves for work and those

perceived by employers, ie why an organisation won't employ older workers. Of the two the latter will be the biggest impediment.

54. ACCI would suggest that raising awareness that all workers includes mature aged workers would be more effective than any new undertaking.
55. Any proposals need to recognise the diversity of the nature and size of workplace and not just focus on larger organisations.

Chapter 4.

Proposal 4-1

56. ACCI supports this proposal provided that there is significant industry engagement and input throughout the inquiry process.

Proposal 4-2

57. ACCI supports this proposal.

Proposal 4-3

58. ACCI supports this proposal provided that there is significant industry engagement and input throughout the review process.

Chapter 5.

Proposal 5-1

59. ACCI believes that this information can be complex and difficult for an employee or job seeker to understand. An advisory service available to support employers and employees would be beneficial to all. ACCI feels that there is merit in seeking industry input into the type and style of information provided.
60. ACCI believes that an industry led campaign, supported by the Department of Education, Employment and Workplace Relations and the Department of Human Services that provided advice and information to employers and employees on the range of offerings and options available to workers approaching retirement age would give employers increased confidence when dealing with mature age workers on matters pertaining to their employment

relationship, incentives for employment and training and options for ongoing engagement.

Question 5-1

61. ACCI stresses the importance of involving employers in developing strategies that will ultimately lead to sustainable employment outcomes for mature age workers. Job Service Australia (JSA) providers need to work with employers to ensure that jobseekers have both the required skills and a work ready attitude to ensure a smooth transition.
62. Communication between JSA providers and employers could benefit from the involvement of intermediaries (such as business and industry associations where appropriate). The concept of “Employers as clients” for JSAs requires greater focus. In particular, ways in which small and medium employers can be supported to establish employment opportunities for unemployed persons is needed. The work of individual JSA providers should tie into overall government, industry, regional and local strategies. Employer engagement should be central to this approach.
63. Services provided by JSA and DES should be mainstream to employer options for filling job vacancies. The use of JSA by employers has fallen to as low of 5% of recruitment. These job services should be part of the general job market, not just a service for the disadvantaged and disengaged. Employers and job seekers alike need to see it not as a welfare offering, but a legitimate part of the job market.
64. Industry feedback suggests that some JSA providers do not have sufficient specialist industry knowledge to make a satisfactory placement so opportunities for real employment outcomes in industry are lost. Stronger engagement between employers and JSAs would lead to JSAs developing a stronger understanding of the needs of employers as well as employers developing an appreciation of the JSAs offerings to employers.

Question 5-2

65. ACCI would support the removal of the “taper rate” of income support reduction for jobseekers aged 55 or older in order to bolster participation rates for older workers and encourage reengagement and long term connection in work for those currently not working.

Proposal 5-3

66. ACCI supports this proposal.

Proposal 5-4

67. ACCI supports this proposal.

Proposal 5-5

68. ACCI supports this proposal.

Chapter 8.

Proposal 8-1.

ACCI believes that there may be scope for reviewing the work test rules on the basis that any additional contributions from the result of gainful employment are beneficial and enhance the likelihood of older workers continuing in employment.

Proposals 8-2

ACCI supports this proposal.

Proposals 8-3

ACCI supports this proposal.

Proposals 8-4

ACCI supports this proposal.

Proposals 8-5

ACCI supports this proposal.

Proposals 8-6

ACCI supports this proposal.

Proposal 8-7.

69. ACCI would support this review provided there was significant input from industry in the process.

Question 8-2.

There is substantial evidence that a large number of potential retirees will not have sufficient superannuation fund balances to support a comfortable retirement. Disincentives are already being introduced to lessen the willingness and capacity of workers to invest further in superannuation. ACCI believes that the ability to partially access superannuation balances on reaching the preservation age can be a significant incentive to encourage a return to or continuation of part-time work whilst adopted a preferred lifestyle.

70. To avoid confusion, consideration could be given to aligning the proposed increased superannuation preservation with the Age Pension age increase final date of 2023.

Question 8-3.

71. ACCI supports alignment of tax-free superannuation access age with increased preservation age and the maintenance of a five year gap with increased Pension Age.

72. These increased age limits will need to be reviewed on the basis of the success or otherwise of other measures taken to remove impediments to mature age workers re-entering or remaining in the workforce. At present superannuation and pension related restrictions form only part of the group of factors discouraging workforce participation by older workers.

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F: 02 6230 6898
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www.bic.asn.au

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www.consultaaustralia.com.au

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F: 02 6257 5658
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F: 03 9329 5060
E: info@mpmsaa.org.au
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NATIONAL ELECTRICAL & COMMUNICATIONS ASSOCIATION

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E: necanat@neca.asn.au
www.neca.asn.au

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www.guild.org.au

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www.restaurantcater.asn.au

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