



**SUBMISSION ON THE
CARBON POLLUTION
REDUCTION SCHEME
GREEN PAPER**

**Australian Chamber of Commerce
& Industry**

September 2008



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INTRODUCTION

Australian will soon implement one of the most difficult and uncertain economic and social policy agendas. ACCI supports this move towards the introduction of a Carbon Pollution Reduction Scheme (CPRS) but expresses concerns with some of the elements contained in the discussion paper.

- ACCI supports the assertion that a very careful balance must be struck between those that receive compensation and those who do not. The overriding principle that a CPRS must be as broad as possible remains key to delivering a low cost abatement CPRS. It is ACCI's view that while the Government has adopted a consultative framework, for those sections of the business community directly affected by a CPRS the concerns expressed by Small and Medium Enterprises (SMEs) have yet to be seriously debated.
- As a matter of economic efficiency and welfare it is important that those most able to adopt new technologies and have access to the lowest-cost abatement opportunities are provided with a carbon price signal to do so. This is fundamental to delivering a 'soft start' while providing a positive environmental outcomes and international credibility.
- ACCI supports greater compensation to Emissions Intensive and Trade Exposed (EITE) Industries and those industries that are strongly affected but remain very mindful of the potential economic implications for other sectors of the economy of doing so.
- New investments in Australia are just as price sensitive as those experienced by incumbents. Not only must the Government consider the immediate impact on the Australian economy of a CPRS but also the future impacts on economic and employment growth. Allowing new investment into Australia, without participating within the CPRS, must be carefully balanced with the competitive effects on incumbents and Australia's international credibility when negotiating the next round of global climate change agreements.

Much of the rationale for Australia's CPRS, rests on the view that we have a role in influencing non-participant countries into joining global greenhouse gas reductions. There is however concern that it may be easy to overstate Australia's ability to leverage any influence on developing countries considering their stated goals for development ahead of emission reductions.

Perversely, should Australia's implementation of a strict emissions target fail to drive international action, this may have adverse economic impacts and hence discourage other nations to pursue the same mitigation objectives.

- Compensation levels for EITE's and strongly affected industries is linked to that of the carbon price. A low carbon price at the beginning of the scheme and before

widespread adoption internationally of a carbon price provides in itself some measure of 'compensation'. While a low carbon price does not reduce the efficiency of the scheme it does to an extent reduce the effects of compensating one sector while imposing costs on another.

- Until there is an international agreement on meaningful action to address climate change Australia will not be able to fully implement a CPRS without additional costs to the economy and suboptimal environmental outcomes. While a large proportion of Government resources are being directed towards implementing a domestic CPRS, greater efforts will need to be made on engaging international members to share the burden.

While SMEs may not be directly affected by a CPRS, they are a vital conduit for the price mechanism to flow through to consumers and this will change Australia's economic structure. However, the effect on SMEs has largely been overlooked. It is generally considered that SMEs are not emissions intensive or highly trade exposed and that any cost increases can readily be passed through to the consumer. In many instance SMEs do operate in export or import competing market and direct and embedded energy costs can be significant.

Moreover many characteristics of SMEs can mean they are less flexible in adapting to changes in input prices compared with larger better capitalised firms.

- ACCI notes that setting targets to 2020 should only proceed after thorough cost benefit analysis and considering the full distributional impact across sectors of the economy. What has not yet been released is Treasury modelling which will estimate the macro, sectoral and distribution costs of implementing different targets and trajectories. This places a limit on the degree to which ACCI can ultimately respond to some design aspects of the CPRS.
- In a large part this concern relates to the potential economic and compliance costs that will be faced by business, especially smaller enterprises which are less able to pass through costs. These costs will be exacerbated where a CPRS operates with very restrictive emissions targets and competitor nations remain outside these arrangements.

ACCI considers that Australia's fuel mix can only change over a long period irrespective of the operation of a CPRS. Unrealistic expectations of a shift from fossil fuels to renewables or the adoption of lower emissions technologies need to be tempered.

Consequently, at the moment, any move to an Australian CPRS in the absence of widespread international commitments must be realistically phased and feature a well conceived compensation regime.

GENERAL COMMENTS

ACCI supports a CPRS that is efficient, maximises participation across all industry sectors and, will include major world emitters, when possible. Furthermore, a domestic CPRS must minimise compliance costs and provide measures to ensure the international competitiveness of trade exposed energy intensive businesses. This should also recognise some SMEs will face energy and transport cost increases with variable, and in some cases limited, opportunities to pass such costs onto final consumers.

ACCI has previously endorsed a series of policy priorities, which form the high-level policy position of our response to climate change. This includes objectives relating to environmental outcomes, economic efficiency, Australia's welfare (underpinned by job security and maintaining competitiveness) and assuming a fair share of the burden.

ACCI has, through its policy processes, previously identified four areas of policy priority needing to be addressed regarding emissions trading schemes:

- Achieving appropriate environmental outcomes;
- Delivering economic efficiency;
- Australia's welfare is not substantially damaged;
 - Australian jobs are not sacrificed;
 - Competitiveness of efficient Australian industries is maintained; and
- Australia assumes a fair share of the burden to reduce greenhouse gas emissions.

These issues have previously been expanded into more detailed policy guidelines to provide the preferred design aspects for an efficient and acceptable emissions trading scheme.

Australia can reduce greenhouse gases by producing goods demanded on the world market using more efficient methods of production and technologies. Australian firms which are forced to move offshore in order to compete with foreign companies, particularly China and India, will most likely produce those goods and services with a higher embodied emissions profile. An energy efficient economy is another way Australia can provide a solution to global warming.

However, incentives need to be market driven, programmes that 'pick winners' are not the most economically efficient method of determining the least costly abatement path. Furthermore, all fuel sources must be considered and their uptake based on sound economic and environmental reasoning. In this respect nuclear power provides Australia with a low cost abatement option compared with other technologies.

Australia has a relative small global carbon footprint but has high emissions per capita largely based on the availability of competitively priced coal resources. Many comparable countries to Australia have smaller emissions per capita based on the use of nuclear energy which is not available to Australian domestic industry or households.

Some key points of Australia's CPRS and what it can achieve:

- The most important contribution Australia can make environmentally to climate change is indirectly through the export and development of clean energy technology, particularly clean coal, to developing nations;
- Australia must encourage developing nations to participate in an international trading scheme;
- Australia can reduce its own emissions although its contribution to global climate change will be marginal;
- Australia must also introduce the most efficient CPRS in order to reach environmental goals at least cost; and
- Leakages of greenhouse gas emissions through the implementation of a CPRS can have significant adverse environmental consequences.

While reductions in greenhouse gas emissions are necessary to stabilise climate change, how quickly targets are reached and the amount of the allowable emissions will determine the eventual costs of the CPRS scheme. These parameters have generally been framed by the scientific evidence of stabilising greenhouse gases in the atmosphere in order to prevent continued global warming.

What has not yet been released is Treasury modelling which will estimate the macro, sectoral and distribution costs of implementing different targets and trajectories. This places a limit on the degree to which ACCI's can ultimately respond to some design aspects.

In regard to economic efficiency the CPRS should:

- Include all technologies in Australia's energy mix (including nuclear power);
- Include the broadest range of sectors;
- Be administratively simple;
- Spread the cost across the economy from businesses to consumers; and
- Create certainty for business when making long term decisions

ACCI's overriding concerns are concentrated in five key areas:

1. As efficient as possible;
2. Have broad coverage;

3. Be implemented with a soft start approach (especially as we are unlikely to have international engagement in the near future);
4. Have an achievable medium term target; and
5. Feature a well-conceived compensation arrangement.

RESPONSE TO GOVERNMENT'S PREFERRED POSITIONS

1. Commencement

It is vital that business are consulted throughout each step of the process and that consideration is given to the time constraints for providing adequate responses. ACCI believes the time available for consultation is very tight and that it is being finalised before the release of Treasury modelling.

While supporting the overall policy objective of the current Government to introduce a CPRS, and acknowledging the Government's election commitment, ACCI is concerned with the commencement date.

The introduction of a CPRS represents one of the largest reforms to the Australian economy in the past two decades, this combined with international uncertainty requires that not only an economically responsible approach be taken but also design aspects of the scheme account for international outcomes. Furthermore, businesses both large and small require a long lead time to become fully informed of the possible affects of a CPRS on their operations.

While there are design aspects of the CPRS that may alleviate business concerns, the best option is to have the most up-to-date information before designing and implementing such a scheme. Therefore, ACCI can only provide conditional support for a number of measures until the release of Treasury modelling.

Given the commencement date is well in advance of any international agreement, including the next Kyoto agreement, it is imperative that Australia's economic growth is not jeopardised by implementing an overly aggressive emissions target.

2. Coverage

Many of the Government's preferred positions on a CPRS are supported by ACCI. This includes broad coverage Australian industry and greenhouse gases in the CPRS.

While ACCI supports the future inclusion of agriculture and the underlying reasoning for its current exclusion, a cent-for-cent offset on transport fuels by economic definition narrows the coverage of the CPRS and may require more emissions reductions in sectors that are not receiving compensation. The scheme as currently designed distorts transport decisions between rail, sea freight and road transport.

ACCI recognises that substitution from relative more emissions intensive transport may be inelastic over the medium term. This is also true of all capital goods and therefore from an economic efficiency perspective there are questions in exempting transport fuels at the beginning of the scheme.

While ACCI has reservations on a cent-for-cent offset for fuel we support the overarching imperative for the current policy position as outlined in the Green Paper.

ACCI also supports the inclusion, subject to measurement issues, of emissions from stationary energy, waste and industrial processes. Furthermore, ACCI supports the continuation of scientific work in the agricultural industry for eventual coverage.

3. Carbon Markets

ACCI supports many of the Government-preferred positions.

ACCI supports the proposal of limited borrowing (5 per cent) but the one-year time limit should be extended. The scheme will set firm caps for a five-year period which includes auctioning current vintage permits and three year advanced permits. Therefore, borrowing should be allowed over these periods.

While ACCI has concerns regarding no restriction on foreign ownership, particularly before a liquid secondary market has been established, we support the overall intention of the policy and would advise the Government to carefully monitor the outcome.

4. Emissions Targets and Caps

ACCI cannot make firm recommendations on emissions targets and caps until the release of Treasury modelling, however, some guidance can be provided without the need to have the cost estimates firmly established.

While the chance for an international ETS scheme becoming widespread remains uncertain, any medium term target will need to have enough flexibility to adjust. The Government's preferred position of setting a medium-term national target range with upper and lower bounds is supported.

ACCI supports a 'soft' start approach to carbon pricing. The CPRS will comprehensively change the nature of business, this has been argued extensively by the vast majority of stakeholders.

A higher carbon price at the beginning will provide an incentive to invest in renewable technologies, however, until these technologies are developed and commercialised a high permit price will be an additional penalty on the Australian economy.

The most important part of the CPRS will be in spurring investment, and this relies on a high future price being established in the forward markets.

In terms of signalling the short-term direction of the national emissions trajectory, ACCI supports the 5-year minimum scheme caps, extended yearly, combined with a 10-year indicative gateway. Consideration should be given to updating the 10-year indicative gateways on a yearly basis to maintain the guidance period avoiding any ‘concertina’ affect.

ACCI supports the Government’s approach to a scheme cap when it is incompatible with international negotiations by purchasing international emissions units to make up any shortfall. This is vital to making the scheme cap a credible signaling mechanism for business and the market.

5. International Linkages

ACCI supports international linkages but notes it is very important to get the policy setting right, as a badly linked scheme will have adverse consequences for the design principles of a CPRS.

International linking can reduce domestic abatement costs by opening up more opportunities for abatement, which may not be available domestically. It may also enhance price discovery through deeper and more liquid markets providing a closer estimate of an international abatement price.

ACCI supports emission reduction units created under the Kyoto Protocol’s joint implementation and Carbon Development Mechanisms (CDMs) being recognised for compliance purposes in the scheme (for the period 2010–11 to 2012–13).

6. Auctioning of Australian Carbon Pollution Permits

The price discovery aspect of auctioning permits allocations can be enhanced through liquidity in the market. It is also important that auctions do not undermine liquidity of any secondary markets highlighting the importance of balancing volumes and frequency.

In terms of allocating permits ACCI supports 100 per cent auctioning of permits, however, this should be phased in over time and complement international agreements.

Auctioned permits should be available when required, be predictable (timing and frequency, sequencing and volumes), there should be fair and equitable access, transparency and efficiency. The method of auctioning should also limit price volatility, address market abuse and be low cost for both the Government and market participants.

In releasing permits Australia must be careful to avoid the experience of the EU. The over allocation of permits resulted in higher prices for consumers without any associated environmental benefit as well as leading to a large redistribution of wealth. However, we acknowledge that significant lessons have been learnt from the initial EU ETS period which are being applied to the Kyoto phase of the scheme.

7. Household Compensation

ACCI supports assistance to low-income households using measures which do not mute the price signal. ACCI supports the measures outlined in the discussion paper such as adjustments to the social security and income tax systems and better information. However, some schemes can lead to a very high cost such as capital subsidies that far exceed the market carbon price. Such subsidies would need to be carefully costed to ensure a solid return on the investment.

8. Emissions Intensive Trade Exposed Industries

ACCI supports compensation to EITE industries and strongly affected domestic industries while there is no international arrangement on addressing climate change. A CPRS can have greater adverse impacts on emissions intensive trade exposed industries and therefore special compensation may be granted. While the goal of any CPRS is to adversely impact emitters and thereby change their behaviour, the issue of ‘leakages’ can become a serious problem where the CPRS coverage is less than global.

While higher compensation of EITE industries means more emissions reductions will be required in other sectors, higher employment losses and lower wage outcomes in the EITE industries sectors will also mean greater compensation.

ACCI supports a greater percentage of compensation to EITE industries than the current 30 per cent (including agriculture). Furthermore, any emissions cap should be increased to allow for new investment by EITE industries.

9. Taxation and Accounting Issues

Aside from the issue of revenue recycling, the tax treatment of the new financial instruments is critically important in designing an efficient ETS.

Other issues, which have not been addressed by Government policy, include the treatment of emissions permits under stamp duty and Capital Gains Tax.

The trading of allowances/credits can be subject to two types of taxes:

- transaction taxes e.g., a sales tax or a stamp duty on each transaction based on the quantity or value; and

- taxes on the difference between the acquisition cost and the sale price. This difference may be subject to GST, income tax and/or capital gains tax.

An example of how a stamp duty, transaction tax might apply is provided below ¹:

Stamp duty may apply to an emissions trading scheme (ETS) at more than one level. It may apply to the sale and purchase of credits under the scheme, which could be treated as dutiable property, within the terms of the duty legislation. For example, in Queensland, it could be dealt with as a statutory licence, depending on the structure of the ETS, or under an amendment specific to the purpose.

There may also be duty at a lower level, on transactions which are necessary to create carbon credits, or those which relate to afforestation. The connection of that duty to the ETS is less obvious, as transactions could occur for purposes other than compliance.

At the higher level, if duty were imposed on trading in carbon credits, that would essentially increase the price of those carbon credits by the rate of duty.

How a Capital Gains Tax, difference between sale price and acquisition cost, may apply ²:

By contrast, the states have begun to argue for the exclusion of capital gains tax (CGT) from an ETS. The Commonwealth could elect to place all trading in carbon credits outside the income tax net, which would eliminate the CGT burden from gains made on the disposal of credits.

However, this would also mean the cost of acquiring credits would be non-deductible, and gains made on trading in credits, within the market, would be non-assessable.

The result would be an advantage to the net producers of carbon credits, and a disadvantage to the net acquirers of carbon credits. Such a detriment and benefit could be priced into the cost of the credits themselves to achieve overall neutrality.

By way of example, if an energy company spends \$1 million acquiring carbon credits, but does not produce any carbon credits, then it would in the ordinary course claim a deduction for the \$1 million. Conversely, if a tree plantation operator 'creates' credits worth \$1 million, and sells them to an energy producer, then in the ordinary course it would be subject to income tax on the \$1 million.

1 Craig Bowie, 'Should Emission Trading Permit be Exempt from Stamp Duty and Capital Gains Tax?', Minter Ellison, 30 August 2007.

2 Ibid.

3 Australian Bureau of Agricultural and Resource Economics, 'The welfare consequences of emission trading with pre-existing taxes', 7th Annual Conference on Global Economic Analysis, Washington, D.C., June 17-19, 2004.

The net result from the Commonwealth's perspective is neutral, assuming that all the entities, which create and acquire credits are in business, and able to make use of deductions or capital losses, which they incur.

The Prime Minister's Task Group on Emissions Trading noted that 'ideally the tax outcome should be neutral', and that 'as the design of the scheme proceeds, there will be greater scope to determine if it can be accommodated within existing tax law in a way that meets the policy intent of least-cost emissions abatement.'

'It also would be desirable not to have stamp duty on the trade of emissions permits ... GST and international tax implications would also require further consideration.'

A number of tax experts have expressed concerns that the taxation system is ill prepared to accommodate the introduction of an ETS. Furthermore, a private tax ruling by the ATO suggests that offsets for travel may not be tax deductible as it was not the carbon that 'directly incurred' in the course of the work.

In the UK allowances are treated as revenue items for tax purposes. The cost of purchased allowances is a business expense and revenue from the sale of allowances is taxable income. Allowances are not subject to stamp duty.

ACCI does not support transaction taxes and therefore would rule out supporting the imposition of a stamp duty on emissions permits. In relation to Capital Gains Tax and its interaction with an ETS, ACCI has not formed a particular view but noted under that stepped rate regime we propose the impact of a CGT would be reduced for assets held over a longer period.

ACCI does not support GST being applied to permits which are in effect financial instruments and should be zero rated.

An CPRS is generally seen as the most efficient market mechanism for reducing greenhouse gases, however, if designed improperly will not take account of other greenhouse gas taxes already present in the economy ³. It is possible that a permit selling country will have a net welfare loss because the reduced use of the already taxed good may dominate the welfare gain from the permit-trading scheme. Therefore, any Government policy must include the effects of pre-existing taxes and the introduction of an CPRS, against removing pre-existing taxes on goods and introducing an CPRS.

ACCI considers that taxes already existing, which are designed for greenhouse gas purposes or have a greenhouse gas consequence, must be carefully analysed for their appropriateness when an Australian ETS is introduced.

10. Transitional Issues

Small and medium-sized enterprises will act as the conduit for prices changes through-out the economy. Without knowing SME's ability to pass costs both up and down the supply chain, it is difficult to estimate the final burden on profits and employment.

Industry compensation should be based on the inability of firms to pass on higher costs to consumers and their capacity to restructure their production processes. However, to achieve environmental outcomes firms must face clear price signals in order to move away from more energy and emissions intensive production processes.

What should also be recognised is that compensation for business is compensation for households. That is, a disproportionate loss in value has flow on consequences for superannuation as well as household wealth and income through shareholding. Small business owners are also likely to require compensation with lowering incomes brought on by a shrinking product market due to changing consumption patterns.

ACCI strongly supports the removal of state market based programs once the CPRS commences.

Sectors within the Australian community, such as those dependent on carbon intensive industry for employment, could potentially suffer disproportionately to other communities. ACCI supports adjustments in terms of training packages for employees but also notes that given the current strength in the labour market this would only be a transitional package.

While small businesses are found throughout the economy it is vital that each business is informed of possible consequences and ways of mitigating the impact of an CPRS. Many small businesses are unaware and ill prepared to adjust current business practices.

ACCI recommends that before the CPRS is operational that information be provided to small and medium businesses. SME's not captured directly in the CPRS and therefore not responsible for acquitting permits may not be fully aware of the exposure to a carbon price signal.

ACCI support the establishment of the Climate Change Action Fund (CCAF) for assisting firms specifically or industry more broadly as well as employees and their communities.

The Government should consider the position of small and medium-sized enterprises that are themselves trade exposed (export and import competing) and their ability to pass on costs to consumers.

ACCI supports the following statements on the ability of SME's to effectively adjust to a CPRS.

'SME's, although generally not producing the same amount of emissions per company, may have a similar order of magnitude of emissions-intensity per unit of revenue (or employee) if the indirect emissions exposure due to material inputs and transport are considered. Furthermore, as most manufacturing SME's are placed at the higher valued-added end of the production chain, they stand to be more trade-exposed than the large energy users producing lower-value goods further down the chain (because the ratio of import costs to price of goods decreases as you move up this chain, increasing import susceptibility).

'SME's have some unique characteristics which make them particularly exposed to adverse impacts of an ETS and less capable of effectively responding to these impacts. This is because they are:

- Less able to move operations off-shore - due to limited skills, knowledge, financial and human resources compared to larger corporations.
- Less able to down-size - because of limited staff numbers available for key roles. In such a case the only option may be to close.
- Less able to assess the impact of an ETS on their business - due to limited technical and scientific capability, human and financial resources.
- Less able to access appropriate information to determine their emissions-intensity and trade-exposure - because of long up-stream and down-stream external and fragmented supply/production chains. For instance, it is difficult for SME business-to-business manufacturers to determine the trade-exposure effect of an ETS on their ultimate consumer market, as this may be several companies removed from them. However, in a large vertically integrated company which deals directly with consumers, or is only one company removed from consumers, this is easier to determine. Longer and more fragmented down-stream external supply chains mean that it is more difficult or impossible to determine the indirect carbon exposure "flow-on" costs from input materials. In the case of a large vertically integrated corporation, the carbon exposure from material inputs are more likely to be known or calculated (from manufacturing processes further back in that company's own production chain).
- Less confident in speaking up and approaching the Government.
- Less visible - if SME's suffer from the impacts of an ETS, this will be less likely to be noticed than if a large company is affected. Because of this, it is particularly important that Government pays attention to the SME sector.⁴

4 Private Submission to the Government's Carbon Pollution Reduction Scheme.

Simple information campaigns while adding to the ability of SMEs to understand the impact of a CPRS it will not be enough to secure the future of many.

To ascertain the full impact of a CPRS on SME's ACCI still awaits the results from Treasury modelling on the overall economic impact.

More analytical work needs to be done by Government on the full economic impact of a CPRS on SME's and in particular the case for compensation arrangements needs to be more fully developed. ACCI will be pursuing this matter with Government as a priority.

11. Governance

Given the long timeframe over which the objectives of an CPRS are to be judged, scheme reviews, which are designed to track the progress of the CPRS against environmental, economic and international circumstances, are warranted. ACCI supports all the features of an CPRS being reassessed, although substantial reviews may not be required as often.

ACCI supports the introduction of an independent 'carbon central bank' as appropriate governance arrangements. Governance arrangements could take the form of those currently in use in the National Electricity Market (NEM), with an independent body for rule making and another independent body enforcing the regulation.

ACCI does not support Government ministers making policy decisions with significant and far-reaching implications. This should be provided to an independent body which has the expertise to implement policies in the interests of economic efficiency.

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WEST MELBOURNE VIC 3003
Telephone: 03 9329 9622
Facsimile: 03 9329 5060
Email: info@mpmsaa.org.au
Website: www.plumber.com.au

National Baking Industry Association

Head Office:
Bread House
49 Gregory Tce
Spring Hill QLD 4000
Phone: 1300 557 022
Email: nbia@nbia.org.au
Website: www.nbia.org.au

National Electrical and Communications Association

Level 4, 30 Atchison Street
ST LEONARDS NSW 2065
Telephone: (02) 9439 8523
Facsimile: (02) 9439 8525
Website: www.neca.asn.au

National Fire Industry Association

PO Box 6825
ST KILDA RD CENTRAL VIC 3000
Telephone: 03 9865 8611
Facsimile: 03 9865 8615
Email: info@nfia.com.au
Website: www.nfia.com.au

National Retail Association Ltd

PO Box 91
FORTITUDE VALLEY QLD 4006
Telephone: 07 3251 3000
Facsimile: 07 3251 3030
Email: info@nationalretailassociation.com.au
Website: www.nationalretailassociation.com.au

Oil Industry Industrial Association

c/- Shell Australia
GPO Box 872K
MELBOURNE VIC 3001
Telephone: 03 9666 5444
Facsimile: 03 9666 5008

Pharmacy Guild of Australia

PO Box 7036
CANBERRA BC ACT 2610
Telephone: 02 6270 1888
Facsimile: 02 6270 1800
Email: guild.nat@guild.org.au
Website: www.guild.org.au

Plastics and Chemicals Industries Association Inc

Level 1, Unit 7, 651 Victoria Street
ABBOTSFORD VIC 3067
Telephone: (03) 9429 0670
Facsimile: (03) 9429 0690
Website: www.pacia.org.au

Printing Industries Association of Australia

25 South Parade
AUBURN NSW 2144
Telephone: 02 8789 7300
Facsimile: 02 8789 7387
Email: info@printnet.com.au
Website: www.printnet.com.au

Restaurant & Catering Australia

Suite 32
401 Pacific Highway
ARTARMON NSW 2604
Telephone: 02 9966 0055
Facsimile: 02 9966 9915
Email: restncat@restaurantcater.asn.au
Website: www.restaurantcater.asn.au

Standards Australia Limited

286 Sussex Street
SYDNEY NSW 2000
Telephone: 1300 65 46 46
Facsimile: 1300 65 49 49
Email: mail@standards.org.au
Website: www.standards.org.au

Victorian Automobile Chamber of Commerce

7th Floor
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MELBOURNE VIC 3000
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