

FAIR WORK AUSTRALIA

Matter No: EM2009/1

ACCI SUBMISSION

26 March 2010

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1. INTRODUCTION

1. The Australian Chamber of Commerce and Industry (ACCI) has filed these written submissions in Matter Number **EM2009/1** pursuant to paragraphs [13] and [14] of a decision by a Full Bench of Fair Work Australia (the Tribunal) in [2010] FWAFB 1543 (the decision):

[13] We are concerned that these matters and the matters of principle raised by the ACTU have not been fully addressed by all interested parties. We propose to provide all interested parties with an opportunity to address them further.

[14] We direct any interested party wishing to address these questions and any other aspect of the matter to file full written submissions by 26 March 2010. We will list the application for supplementary oral submissions on 7 and 8 April 2010. Thereafter we shall determine the application.

2. The decision concerns applications filed by Molanka Pty Ltd, D.A. Management Pty Ltd, Reiconn Pty Ltd to modernise the Bank of Queensland Agents Award 2004 under item 4 of Schedule 6 to the *Fair Work (Transitional Provisions and Consequential Amendments) Act 2009* (the Transitional Act).
3. ACCI welcomes the opportunity to provide submissions in this matter.
4. The submissions are without prejudice to ACCI or ACCI members' further consideration of these matters.

2. SUBMISSION

5. At paragraphs [11] and [12] of the decision, the Full Bench states:

Should a modern enterprise award be made?

[11] The FSU opposes the making of a modern enterprise award and does so by reference to the factors which need to be considered under item 4 of Schedule 6 to the Transitional Act. The applicants have also addressed these factors in relation to the general question whether to make a modern enterprise award. The ACTU did not seek to make particular submissions on the detail of this application but put forward certain principles to be considered in determining the application.

[12] This is the first application to make a modern enterprise award. It is a contested matter which raises important considerations about the operation of the modern enterprise awards objective, and the interaction between that objective, the modern awards objective and the minimum wages objective.⁵ The matter also raises important considerations concerning the factors required to be taken into account under item 4 of Schedule 6 to the Transitional Act, both in relation to whether a modern enterprise award should be made and if so, the content of any such award.

6. ACCI's submission primarily addresses issues raised by the Full Bench and ACTU and union affiliates and does not express a view as to the merits of the applicants' application.

ENTERPRISE AWARDS - CONTEXT

7. ACCI considers it important to provide the following general submissions about the context of these applications. We do so on the basis that the context is fundamental to the consideration of how these matters should be dealt with by the Tribunal.
8. Enterprise awards¹ were originally established against the background of a variety of different circumstances that existed in the individual enterprises in which they were developed.
9. They provide award terms that were tailored in a more specific way to the needs of the enterprise and its employees, in place of the various industry or occupational based award(s) that otherwise applied.

¹ We note that item 2(1) of Schedule 6 refers to three different species of "enterprise instrument". Any reference to "enterprise awards" made in this submission shall generally refer all of those instruments.

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10. The reality is that the history and circumstances of enterprise awards is not homogenous.
 11. Therefore, it is important to note that in some cases:
 - a. The enterprise award was established before statutory agreement making options were part of workplace regulation, and at a time when the parties were seeking, for various reasons, to tailor award regulation in a manner that was better suited to the needs of their workplace and their employees;
 - b. The enterprise award may have become the foundation upon which successive enterprise agreements have been benchmarked against within that enterprise;
 - c. Industrial action may have precipitated and resulted in the creation of the enterprise award;
 - d. The enterprise award may have been an important means to enable national organisations to establish consistent employment arrangements across the country;
 - e. Employers may prefer to keep these arrangements in some form under the Division 2 process;
 - f. Employers may equally seek to move away from these arrangements under the Division 2 process.
 12. Any application to modernise or terminate existing enterprise instruments will inevitably invite different views and positions about the future of these instruments, simply because they were established against the background of a range of different circumstances in individual workplaces. There is no presumption that Parliament intended for all enterprise awards to be either modernised or terminated. Clearly, there is a detailed process within Division 2 of Schedule 6 for considering applications on a case-by-case basis.
 13. It is those individual circumstances which must be assessed against the relevant statutory criteria and which must ultimately guide the Tribunal.
 14. The Transitional Act sets out the specific and detailed criteria that the Tribunal must consider in deciding whether to modernise or terminate an enterprise specific award.
 15. The Tribunal must have regard to both the *modern awards objective* under s.134 and the *minimum wages objective*, under s.284 of the *Fair Work Act 2009* (the Act). In considering and applying those objectives, the Tribunal must also recognise that a modern enterprise award may provide “*terms and conditions tailored to reflect*

employment arrangements that have been developed in relation to the relevant enterprises.” This is the modern enterprise award objective.

16. In ACCI’s submission, the correct approach to Division 2 is for the statutory criteria to be considered against the background of all of the circumstances that apply at the enterprise(s), including the historical antecedents which led to the making of the enterprise award.
17. It will therefore be necessary for the Tribunal to give appropriate weight to those criteria in any application to make a new modern enterprise award or terminate an existing enterprise award, and against the background of the specific criteria surrounding the establishment and operation of the particular enterprise instrument in question.
18. ACCI’s primary submission is that this is not a process that requires broad direction or specific principles established by the Tribunal. The principal consideration should be to consider the relevant criteria against the enterprise instrument.

STATUTORY CONTEXT

19. The applications are governed primarily by Schedule 6 of the Transitional Act and more specifically Division 2, of Part 2 to Schedule 6.
20. It is uncontroversial that the Act repealed the *Workplace Relations Act 2009* (WR Act) subject to the preservation of certain rights, entitlements and instruments by transitional legislation.²
21. Modern awards were created under Part 10A of the former WR Act and specifically, by way of the Award Modernisation Request under former s.576(c).
22. Item 4(2) is a discretionary power. The Tribunal may exercise its discretion upon the receipt of a competent application to make a modern award (an enterprise award) to replace an enterprise instrument (as defined in item 2).
23. Applications may be made by a “*person covered by the enterprise instrument*” during the period starting on WR Act repeal date (1 July 2009) and ending on 31 December 2013.³
24. Sub-item 4(5) outlines the relevant criteria that the Tribunal must take into account in deciding “*whether or not to make a modern enterprise award*”. It is important note that Parliament specifically drafted item 4 in a way that makes clear that the

² Mainly by virtue of the *Fair Work (Transitional Provisions and Consequential Amendments) Act 2009* (TPCA Act)

³ Item 4(2)(a) and (b).

- Tribunal must consider eight (8) separate factors. The failure of the Tribunal to do so may give rise to error and subsequent legal challenge.
25. Item 5 allows a person covered by an enterprise instrument to apply to the Tribunal for an order to terminate the instrument. Once again, the Tribunal has a discretionary power and may (a) terminate the instrument, (b) decide that the instrument should not be terminated, or (c) decide to treat the application as if were an application under item 4. Sub-item 5(4) requires the Tribunal to take into account eight (8) separate factors.
 26. ACCI submits that these factors are an exhaustive list. There are no other matters prescribed by the regulations under sub-item 4(5)(h) or 5(4)(h).
 27. Item 6 specifies that the *“modern awards objective and the minimum wage objective apply to FWA making a modern enterprise award under this Division”*. Sub-item 6(2) outlines the *“modern enterprise awards objective”*.
 28. Item 9(3) specifies that should the Tribunal not make a modern enterprise award, the instrument terminates when the relevant decision comes into operation. Therefore, there is significant risk to an employer in making an application to modernise the instrument.
 29. Item 4(2) states that Division 2 will only apply when a competent application is made. The Tribunal does not have an *“own motion”* power to determine such applications. Sub-item 9(4) works as a sunset provision for enterprise instruments. Should no application be made either under items 4 or 5 during the relevant period, all enterprise instruments will terminate at midnight on 31 December 2013.
 30. There is clearly a lengthier process available for persons to make applications under Division 2 and for the Tribunal to consider any applications under Division 2. This is in contrast to the Part 10A award modernisation process which required the AIRC to create modern awards within a much shorter time frame and which involved consideration of thousands of award based instruments.
 31. Section 3 outlines the objectives of the Act as follows:

3 Object of this Act

The object of this Act is to provide a balanced framework for cooperative and productive workplace relations that promotes national economic prosperity and social inclusion for all Australians by:

- (a) providing workplace relations laws that are fair to working Australians, are flexible for businesses, promote productivity and economic growth for

Australia's future economic prosperity and take into account Australia's international labour obligations; and

(b) ensuring a guaranteed safety net of fair, relevant and enforceable minimum terms and conditions through the National Employment Standards, modern awards and national minimum wage orders; and

(c) ensuring that the guaranteed safety net of fair, relevant and enforceable minimum wages and conditions can no longer be undermined by the making of statutory individual employment agreements of any kind given that such agreements can never be part of a fair workplace relations system; and

(d) assisting employees to balance their work and family responsibilities by providing for flexible working arrangements; and

(e) enabling fairness and representation at work and the prevention of discrimination by recognising the right to freedom of association and the right to be represented, protecting against unfair treatment and discrimination, providing accessible and effective procedures to resolve grievances and disputes and providing effective compliance mechanisms; and

(f) achieving productivity and fairness through an emphasis on enterprise-level collective bargaining underpinned by simple good faith bargaining obligations and clear rules governing industrial action; and

(g) acknowledging the special circumstances of small and medium-sized businesses.

32. Section 134 outlines the modern awards objective:

Division 2—Overarching provisions

134 The modern awards objective

What is the modern awards objective?

(1) FWA must ensure that modern awards, together with the National Employment Standards, provide a fair and relevant minimum safety net of terms and conditions, taking into account:

(a) relative living standards and the needs of the low paid; and

(b) the need to encourage collective bargaining; and

(c) the need to promote social inclusion through increased workforce participation; and

(d) the need to promote flexible modern work practices and the efficient and productive performance of work; and

(e) the principle of equal remuneration for work of equal or comparable value; and

(f) the likely impact of any exercise of modern award powers on business, including on productivity, employment costs and the regulatory burden; and

(g) the need to ensure a simple, easy to understand, stable and sustainable modern award system for Australia that avoids unnecessary overlap of modern awards; and

(h) the likely impact of any exercise of modern award powers on employment growth, inflation and the sustainability, performance and competitiveness of the national economy.

This is the **modern awards objective**.

When does the modern awards objective apply?

(2) The modern awards objective applies to the performance or exercise of FWA's **modern award powers**, which are:

(a) FWA's functions or powers under this Part; and

(b) FWA's functions or powers under Part 2-6, so far as they relate to modern award minimum wages.

Note: FWA must also take into account the objects of this Act and any other applicable provisions. For example, if FWA is setting, varying or revoking modern award minimum wages, the minimum wages objective also applies (see section 284).

33. Section 284(1) outlines the minimum wages objective:

284 The minimum wages objective

What is the minimum wages objective?

(1) FWA must establish and maintain a safety net of fair minimum wages, taking into account:

(a) the performance and competitiveness of the national economy, including productivity, business competitiveness and viability, inflation and employment growth; and

(b) promoting social inclusion through increased workforce participation; and

(c) relative living standards and the needs of the low paid; and

(d) the principle of equal remuneration for work of equal or comparable value; and

(e) providing a comprehensive range of fair minimum wages to junior employees, employees to whom training arrangements apply and employees with a disability.

This is the **minimum wages objective**.

EXTRANEOUS MATERIALS

34. There are a range of relevant extraneous materials which assist the Tribunal in understanding the policy intention and the correct approach to Division 2 of Schedule 6.
35. The Minister for Employment and Workplace Relations in her second reading speech to the Transitional Bill provides the following policy rationale for Division 2 as follows:⁴

Treatment of existing instruments in the new system

Fourthly, the bill includes rules in relation to the treatment of existing instruments in the new system, including:

...

- Rules providing for the cessation of award-based instruments (such as un-modernised awards, notional agreements preserving state awards and pay scales) once they are replaced by modern awards.

...

- A process is provided to allow parties to enterprise awards and notional agreements preserving state awards derived from state enterprise awards to apply to Fair Work Australia to have their enterprise award modernised and integrated into the modern award system. The arrangements include awards that apply to a number of franchisees of the same franchisor to be included within this framework.

36. The revised Explanatory Memorandum (EM) relevantly provides:⁵

Part 2 – The enterprise instrument modernisation process

241. This Part provides for the modernisation of enterprise instruments.

242. Enterprise awards and NAPSAs that were derived from a State enterprise award are excluded from the award modernisation process that is being undertaken by the AIRC. This Part provides for the integration of those awards into the new workplace relations system.

243. This Part also provides for the modernisation of certain preserved State agreements.

244. In exercising its functions and powers under this Schedule, FWA must consider specified criteria.

⁴ House of Representatives, Second Reading speech, Fair Work (Transitional Provisions and Consequential Amendments) Bill 2009, Thursday, 19 March 2009.

⁵ Senate, Revised Explanatory Memorandum, Fair Work (Transitional Provisions and Consequential Amendments) Bill 2009, at p.42.

245. The modern awards objective and the minimum wages objective (see sections 134 and 284 of the FW Act) also apply to enterprise instrument modernisation (see item 6). This ensures that FWA considers the broader issues included in those objectives.

246. However, in considering these objectives, FWA must recognise the particular role and nature of enterprise awards (see item 6).

247. FWA is able to inform itself as it sees fit in conducting the modernisation process (see Schedule 2). This enables FWA to seek and consider submissions not only from those with a direct interest in the award, but also other interested parties (e.g., other employers in the relevant industry). (emphasis added).

37. With respect to item 6, the EM relevantly provides:⁶

Item 6 – The modern enterprise awards objective

279. This item extends the operation of the modern awards objective and the minimum wages objective to FWA's making of modern enterprise awards. This means that FWA takes into account the same social and economic factors in making modern enterprise awards as when making other modern awards. These factors include, for example, the impact on business, including business competitiveness and viability (see paragraphs 134(1)(f) and 284(1)(a) of the FW Act).

280. As well as applying the modern awards objective and the minimum wages objective to the making of modern enterprise awards, FWA is also required to apply the modern enterprise awards objective.

281. The modern enterprise awards objective requires FWA to recognise that modern enterprise awards may provide tailored terms and conditions of employment that reflect arrangements that have developed in relation to specific enterprises.

282. The intention of this item is that the factors listed in paragraphs 134(1)(a)-(h) and 284(1)(a)-(e) of the FW Act relating to the modern awards objective and minimum wages objective respectively should apply to the making of modern enterprise awards, as they do to the making of modern awards generally. However, the minimum terms and conditions for a modern enterprise award may not necessarily be the same as those that apply to an industry or occupation-based modern award.

283. An enterprise may have developed employment arrangements over a period of time that meet the particular needs of that enterprise and reflect the way in which the enterprise operates. The criteria that FWA will apply in deciding whether to make a modern enterprise award require FWA to consider any enterprise specific arrangements that apply in a particular enterprise. FWA will be able to maintain any enterprise specific arrangements in a modern enterprise award where it considers that this is appropriate to do so.

⁶ Ibid, at pp. 45-46.

Illustrative example

Wrenview Island Resort operates a remote island resort. The Wrenview Island Resort Enterprise Award includes a number of enterprise-specific arrangements that suit the needs of the business. For example, under the Wrenview Island Resort Enterprise Award, a maximum of 10 ordinary hours may be worked per day within a spread of 16 hours per day from starting time, inclusive of meal breaks. The rates of pay for all employees covered by the enterprise award have been annualised to incorporate compensation for employees working 15 weekends and six public holidays per year. Wrenview and its employees are keen for these working arrangements to remain in the new system and are able to make submissions to FWA that the enterprise award be modernised, taking into account these longstanding enterprise-specific arrangements.

285. In setting the terms and conditions, it is intended that FWA will take into account the employment arrangements that have been developed for the enterprise and which are reflected in the enterprise award. This is not intended, however, to impose an obligation on FWA to only include tailored terms in modern enterprise awards. Rather, the item is designed to ensure that FWA has regard to the fact that an enterprise instrument may contain tailored terms because they have been developed to meet the needs of a particular enterprise.

CORRECT APPROACH TO DIVISION 2 OF SCHEDULE 6

38. ACCI submits that the explanatory materials extracted above, when read with the relevant provisions, indicate the following.
39. Firstly, there is no presumption in Schedule 6 that the Tribunal should consider any other factors or considerations, other than the ones specifically legislated. That is, the Tribunal must only consider the factors and considerations under items 4(5), 5(4) and 6. Parliament has made clear that the Tribunal must consider a range of separate factors/considerations in determining a competent application. These are exhaustive matters.
40. To invite the Tribunal to consider general “principles” which would apply in a particular case, or to all applications that sought to modernise or terminate an instrument, would in ACCI’s submission, invite the Tribunal to consider irrelevant matters and which may lead to error.
41. Secondly, ACCI submits that each application must be considered on a case-by-case basis. Furthermore, in order for the Tribunal to validly exercise its jurisdiction, it must turn its mind to each and every relevant criterion. This would be akin to a line-by-line assessment for some criteria against the relevant instrument.

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42. For example, item 4(5)(c), (d) and (e) requires the Tribunal to actually consider the terms of the relevant instrument, whilst sub-items 4(5)(a) and (f) requires the Tribunal to consider the antecedents to the creation of the instrument, and the impact on employees and business. In the case of the latter, the Tribunal must specifically consider any impact on the ongoing viability or competitiveness of any enterprise carried on by those persons.
43. Equally, the Tribunal must turn its mind to each consideration in item 5(4) before exercising its discretion. Once again, ACCI submits that this requires an assessment by the Tribunal on a case-by-case basis, and in some cases, on a line-by-line basis between the relevant instruments.
44. Thirdly, the EM clearly articulates the type of persons that should be heard upon an application being made. ACCI submits that any person to be heard should have a relevant nexus or connection to the application.

284. FWA will be able to inform itself in such manner as it considers appropriate, in accordance with section 590 of the FW Act, in exercising its functions in relation to modern enterprise awards. This will allow FWA to consult with and receive submissions from persons other than those covered by an enterprise instrument where appropriate. For example, when considering whether to modernise an enterprise instrument and, if so, the terms that it may include in a modern enterprise award, FWA may consider it appropriate to consult with and receive submissions from other businesses operating in the same industry.

45. Whilst it is entirely a matter for the Tribunal to inform itself as it sees fit and accord weight to particular submissions, it is clear that the employers, employees, and any other person that could be bound by the instrument, are best placed to provide cogent and relevant information on matters affecting the Tribunal's discretionary powers under Division 2.
46. Item 6: ACCI submits that there may be some ambiguity as to how item 6 is to operate. Upon one legitimate reading, one could interpret the provision in a way that item 6 would only be enlivened if the Tribunal decided to exercise its discretion and then decided to make a modern award.
47. However, the explanatory memorandum to the Transitional Act, appears to indicate that the modern awards objective and the minimum wage objective applies at all stages (ie. when considering whether to exercise jurisdiction under item 4, and after deciding to exercise its discretion and actually make a modern award).

SUBMISSIONS OF ACTU/FSU

48. In relation to the written submissions of the ACTU and FSU, ACCI makes the following submissions in reply.
- a. ACCI strongly opposes “*the matters of principle associated with the consideration of applications under this schedule*” as outlined in the ACTU submission. For the avoidance of doubt, ACCI specifically opposes those submissions outlined at paragraphs **4, 21, 23, 24, 26, 27, 29, 32, 33, 34, 35, 37, 38, 40, and 43** of the ACTU submission. The ACTU is in effect importing a range of new considerations that are additional or seek to re-interpret extant criteria. The only factors that must be considered are those outlined in items 4, 5 and 6. There is no presumption as to the type of evidence or weight that must be given to each factor. Once again, to invite the Tribunal to consider general principles will require consideration of irrelevant factors.
 - b. ACCI does not support the submissions at paragraph **12** of the ACTU submission. There is simply no such presumption created by item 6 and the modern awards objective.
 - c. There is no presumption that because of the existence of a particular modern award for a specific industry or occupation, that this fact of itself should be determinative or provide substantial weight to the question which must be decided by the Tribunal.
 - d. To the extent that other parties in these proceedings (or other unrelated proceedings) raise similar submissions to the ACTU, they are strongly opposed for the same reasons.

3. CONCLUSION

49. ACCI submits that the determination of these applications by this Full Bench should not be a precedent for the approach that the Tribunal will adopt in relation to other applications under Division 2 of Schedule 6.
50. As ACCI has attempted to illustrate, the schema of the legislation and the different circumstances in which individual enterprise instruments were established requires the Tribunal to apply the relevant statutory provisions to the specific instrument on a case-by-case basis.

51. This means that the Tribunal should not adopt any general principles proposed by parties, nor should it create principles that flow-on or impact the determination of other applications. To suggest that any final decision from these applications establishes a precedent or is akin to a “test case” for other applications (whether those applications are made pursuant to item 4 or 5), are strongly opposed by ACCI. This would undermine the process which Parliament clearly envisioned for applications under Division 2.

ABOUT ACCI – LEADING AUSTRALIAN BUSINESS

ACCI has been the peak council of Australian business associations for 105 years and traces its heritage back to Australia's first chamber of commerce in 1826.

Our motto is "Leading Australian Business."

We are also the ongoing amalgamation of the nation's leading federal business organisations - Australian Chamber of Commerce, the Associated Chamber of Manufactures of Australia, the Australian Council of Employers Federations and the Confederation of Australian Industry.

Membership of ACCI is made up of the State and Territory Chambers of Commerce and Industry together with the major national industry associations.

Through our membership, ACCI represents over 350,000 businesses nationwide, including over 280,000 enterprises employing less than 20 people, over 55,000 enterprises employing between 20-100 people and the top 100 companies.

Our employer network employs over 4 million people which makes ACCI the largest and most representative business organisation in Australia.

Our Activities

ACCI takes a leading role in representing the views of Australian business to Government.

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.

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- Business representation on a range of statutory and business boards, committees and other fora.
 - Representing business in national and international fora including Fair Work Australia, Australian Industrial Relations Commission, Safe Work Australia, International Labour Organisation, International Organisation of Employers, International Chamber of Commerce, the Business and Industry Advisory Committee to the Organisation for Economic Co-operation and Development, the Confederation of Asia-Pacific Chambers of Commerce and Industry and the Confederation of Asia-Pacific Employers.
 - Research and policy development on issues concerning Australian business.
 - The publication of leading business surveys and other information products.
 - Providing forums for collective discussion amongst businesses on matters of law and policy affecting commerce and industry.

Publications

A range of publications are available from ACCI, with details of our activities and policies including:

- The ACCI Policy Review; a analysis of major policy issues affecting the Australian economy and business.
- Issue papers commenting on business' views of contemporary policy issues.
- Policies of the Australian Chamber of Commerce and Industry – the annual bound compendium of ACCI's policy platforms.
- The Westpac-ACCI Survey of Industrial Trends - the longest, continuous running private sector survey in Australia. A leading barometer of economic activity and the most important survey of manufacturing industry in Australia.
- The ACCI Survey of Investor Confidence – which gives an analysis of the direction of investment by business in Australia.

- The Commonwealth-ACCI Business Expectations Survey - which aggregates individual surveys by ACCI member organisations and covers firms of all sizes in all States and Territories.
- The ACCI Small Business Survey – which is a survey of small business derived from the Business Expectations Survey data.
- Workplace relations reports and discussion papers, including the ACCI Modern Workplace: Modern Future 2002-2010 Policy Blueprint and the Functioning Federalism and the Case for a National Workplace Relations System and The Economic Case for Workplace Relations Reform Position Papers.
- Occupational health and safety guides and updates, including the National OHS Strategy and the Modern Workplace: Safer Workplace Policy Blueprint.
- Trade reports and discussion papers including the Riding the Chinese Dragon: Opportunities and Challenges for Australia and the World Position Paper.
- Education and training reports and discussion papers including ACCI's Skills for a Nation 2007-2017 Blueprint.
- The ACCI Annual Report providing a summary of major activities and achievements for the previous year.
- The ACCI Taxation Reform Blueprint: A Strategy for the Australian Taxation System 2004–2014.
- The ACCI Manufacturing Sector Position Paper: The Future of Australia's Manufacturing Sector: A Blueprint for Success.

Most of this information, as well as ACCI media releases, parliamentary submissions and reports, is available on our website – www.acci.asn.au.

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Telephone: 03 9865 8611
Facsimile: 03 9865 8615
Website: www.nfia.com.au

National Retail Association Ltd

PO Box 91
FORTITUDE VALLEY QLD 4006
Telephone: 07 3251 3000
Facsimile: 07 3251 3030
Website: www.nra.net.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
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
Website: www.printnet.com.au

Restaurant & Catering Australia

Suite 17, 401 Pacific Highway
ARTARMON NSW 2064
Telephone: 1300 722 878
Facsimile: 1300 722 396
Website: www.restaurantcater.asn.au

Standards Australia Limited

Level 10, 20 Bridge Street
SYDNEY NSW 2000
Telephone: 02 9237 6000
Facsimile: 02 9237 6010
Website: www.standards.org.au

Victorian Automobile Chamber of Commerce

7th Floor
464 St Kilda Road
MELBOURNE VIC 3000
Telephone: 03 9829 1111
Facsimile: 03 9820 3401
Website: www.vacc.com.au