



PRODUCTIVITY COMMISSION INQUIRY INTO CHILDCARE AND EARLY CHILDHOOD LEARNING

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1. EXECUTIVE SUMMARY

Although the Productivity Commission's inquiry covers both child care and early childhood learning, in this submission, ACCI primarily focuses commentary on child care, noting that the policy and consumer drivers in these two interlinked areas are different. This is not to suggest that early childhood learning is not important to the business community, but more that the evidence is clear that structured learning prior to school is highly beneficial, and Australia's commitment to access for all children to at least one year prior to school is supported.

Addressing the challenge of increasing child care to encourage female workforce participation is not easy. There are a number of important contextual issues around social norms, equity, fiscal constraints, and the impact of workforce absences on future earnings and pension needs that make the finding of acceptable solutions a complex and difficult task.

Finding efficiencies and improving effectiveness within the existing framework will only go so far in achieving affordable, flexible and accessible child care options for parents. It is clearly unaffordable to increase the subsidies in their current format to fund a growth in access to child care. In line with our pre-budget submission to Treasury, ACCI reiterates the need to look at further means testing of the child care benefit and rebate to rein in expenditure. This is consistent with ACCI's overall fiscal position of the Government charting and following a path to surplus.

However, ACCI in this submission also recognises that it is economically unaffordable to continue to experience poor utilisation of skills developed by females through education, and to face a labour market future with relatively low workforce participation rates, particularly female participation rates and low average hours worked.

Therefore, the need for fiscal restraint coupled with the need to substantially increase female participation in the workforce calls for solutions beyond the existing framework. ACCI have put forward two alternatives, being an increase in au pairs and the potential for HECS style loans to extend the cost of the peak child care cost years over a longer period. ACCI also encourages the Productivity Commission to stimulate further discussion on solutions beyond those that currently exist.

2. ABOUT ACCI

2.1 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
- 30 national industry associations
- Bilateral and multilateral business organisations.

In this way, ACCI provides leadership for more than 300,000 businesses which:

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

2.2 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 the Fair Work Commission, 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.

3. CONTEXT

Although there is cross-over in the delivery of Early Childhood learning and child care, there are differences in the consumer drivers and public policy considerations of the two services.

Finding sustainable solutions to child care provision is challenging due to some fundamental contextual issues:

- Australian society has embraced in its systems and social norms the concept that all girls and women should have equal opportunity and aspiration to the education and career of their choice, but societal norms and social conditioning for child-raising and home making responsibilities have not shifted at the same pace.
- Our needs for a future skilled workforce, the aging of the existing population, and the need to maximise the public and private return on the investment in skills development, require strategies that significantly improve workforce participation of women.
- To achieve substantial improvement in the participation rate for women under the existing subsidised and regulatory models for child care would require a significant and arguably unaffordable and unsustainable additional investment by Government in subsidies.
- The challenge of improving participation rates also encourages mature aged workers (both men and women) to stay in the workforce longer. This, along with different social and lifestyle choices, has reduced the availability of family child care options, particularly grandparent assistance. This trend is set to continue, and economically needs to for the same reason as female participation is so important.
- It is hard to think of another service where the cost, which is so dominated by labour costs, in its affordability, is so inextricably and directly linked to the income of the purchaser. One perverse example of this link is that pressures to increase the wages of the child care workforce (largely female) increase the cost of the service to the user and result in many purchasers (largely female) to decide not to work, or to work less hours than they otherwise would.
- Long absences by women from the workforce due to child rearing create issues relating to reengagement and a substantial lowering of superannuation and wage outcomes for women. This has a negative impact on welfare support benefits due to a stronger reliance on the pension and other services.

These contextual issues require more than merely an examination of the existing options available to families for child care, although an analysis of efficiency and effectiveness of matters (as covered in the issues paper) such as subsidies, regulation, salary packaging and FBT are all important and worthy of detailed consideration by the Productivity Commission. However, these matters should not be the starting point – Child Care is not an end in itself, nor primarily an optional extra or luxury choice of a consumer. If it was, then public investment in subsidies and the system would not be justifiable beyond perhaps the subsidised service of occasional care.

Child Care for children under school age and for after school care is the means by which both parents of children, or in the case of single parents, that parent, can continue to participate in the workforce.

Public investment in early childhood education is justifiable due to increasing evidence that structured learning in an appropriate environment for young children leads to better educational and life outcomes. Whilst acknowledging that the Productivity Commission is only following the lead of others, by combining child care and Early Childhood learning the issues paper in its commentary (and even in the one acronym of ECEC) dilutes the consideration of the public policy imperatives that drive investment in each component. Further, combining the consideration of ECEC takes a supply-side view, reflecting that in the service provision, child carers will impart some learning, and structured learning environments such as pre-schools will also need to “care” for the children (Long Day Care Centres for older children often do both). This point may seem semantic, but recognition of the different policy objectives is linked to the question of what role is being performed and what outcomes are expected. These questions are sufficiently worthy of separate consideration rather than a “bundled” approach.

4. CHILDCARE

4.1 Workforce Participation

As the peak business body, ACCI’s primary interest in more accessible, efficient and affordable Child Care arrangements is its vital role in the achievement of increased participation rates and greater utilisation of skills acquired by (largely) women who are challenged by decisions as to whether to continue working at the same level and for the same hours as prior to child birth.

The December 2013 Labour Force Statistics¹ demonstrate the current differential between male and female participation:

- Male participation rate was 71.1% compared to 58.4% for females
- Of the 6.3 million males in the workforce, only 17.2% are part time. Of the 5.3 million females, 46% are part time.
- For December 2013, of the just over 1 billion hours worked by males, only 7.6% of those hours were part time; for females, of the 636 million hours worked, 28% of hours were performed by part time workers.

The link between workforce participation rates and productivity and economic performance are well understood.² The study by the Grattan Institute in 2012 which is quoted in the Commission's issues paper provides evidence of the potential economic value of increasing female workforce participation. We would encourage the Productivity Commission as part of this review to validate this assessment of economic benefit as it is a strong incentive for significant change and will enable an assessment of the taxation revenue and broader economic benefit to be balanced against any proposed cost increases.

In ACCI's *Employ Outside the Box* initiative (see [link](#)), the economic case of increasing workforce participation is strongly reinforced in the context of an aging workforce and the need to plan for future labour and skill needs.

4.2 Skills Utilisation

Appropriately, society offers equal opportunity for girls and women to pursue the educational and career options of their choice. The following statistical summary illustrates the active engagement of females in education and training:

- In 2013, more than half of all commencing students in higher education were female (56.8 per cent).³
- The number of female graduates of universities in 2012 who were in or seeking full time employment in 2013 was 26,010, compared with 17,344 males. Both genders experienced equal success (at 71.3%) in securing full time employment during or within 3 months of graduation.⁴
- In 2012, 83.4% of all 19 year old females were in some form of education and training (including apprenticeships), compared with 80.4% of males.

¹ ABS, (2014) 6202.0 Labour Force, December 2013

² *It is clear from the Commission's issues paper that the need to improve the participation rates is well understood, and it is not necessary to repeat evidence already contained in the paper.*

³ Department of Education, Higher Education Statistics 2013, http://docs.education.gov.au/system/files/doc/other/2013_first_half_year_student_summary.pdf

⁴ Graduate Careers Australia (2013), <http://www.graduatecareers.com.au/wp-content/uploads/2013/12/GCAGradStats2013.pdf>

Reflective of the above graduate figures, 17.9% were in higher education, compared to only 12.5% of males.

These figures demonstrate that in relation to females, both the individual and the public (through subsidised education) are making a substantial investment in skills development. However, given the participation rate differential highlighted in 4.1, the challenge is how the individual, the economy and society maximises the return on that investment. Appropriately priced, accessible and flexible child care arrangements will not only serve to improve participation during the period when children are under school age, but assist in skills utilisation outcomes for a lifetime. Unless we address the female participation rate, then the number of graduates will need to be even greater than the current workforce projection figures are indicating, as the actual utilisation of the skills will not meet the expectation. Given society's acceptance of the equality of educational opportunity, it is simply not an option to discourage women from becoming more highly educated, so the solution has to address the barriers to participation.

4.3 Social Norms

So far, the discussion has focused on statistics and economics. However, the societal acceptance of the equality of opportunity has outpaced societal expectations of which gender primarily bears the burden of child rearing. This is not just an external expectation imposed on women; for many women it is a role willingly accepted, influenced one would suspect not just by conditioning but biology (although ACCI does not put itself forward as a scientific body). The practical outcome of this current reality is that equal participation may be unachievable, so economic benefit is best measured through participation rates for women that have been actually achieved in comparable countries. Again, the Grattan Institute's work is an example of this approach.

4.4 Fiscal Impact

ACCI remains strongly committed to the importance of the Federal Government charting and following a path to budget surplus. Recommendations that would include significant increases in child care subsidies are not sustainable under existing take up rates, let alone provide the significant increase in child care access needed to achieve a substantial participation rates. However, if the projections of GDP growth resulting from increasing participation are validated, it is feasible that in real terms the overall investment by Government in child care support could grow in line with taxation revenue generated from economic growth, but it should not grow in relative terms.

It is also important to note that the Government currently has another major policy which it claims addresses the same issue of female workforce participation, being the upgrade in the paid parental leave scheme. The business community remains opposed to the cost of this scheme and the planned corporate tax increase which in part will fund it. ACCI believes that improve child care arrangements will have a far greater impact on female participation than the paid parental leave scheme, and if the Government is committed to substantial investment in this policy space, it would be far better to reduce the overall cost of the PPL and redirect some of the investment into better child care outcomes.

4.5 Improving the Existing Landscape

Much of the issues paper summarises the current landscape including subsidies, quality framework, availability, flexibility and affordability.

4.5.1 Child Care Benefit and Rebate

In our 2014 Pre-Budget submission, ACCI has stated that the business community is concerned about the sustainability and affordability of these forms of assistance given the difficult current budget situation.

It is estimated that the taxpayer will provide \$22.1 billion in support to households in the form of the Child Care Benefit (CCB) and the Child Care Rebate (CCR) over the next four years.

According to the 2013-14 Budget the government has more than doubled spending on childcare support since 2007, representing an increase of 115 per cent over the last six years. While the CCB is currently income tested, the CCR is not. The cost to the budget of child care payments was escalated when the former government increased the CCR from 30 per cent to 50 per cent of out-of-pocket costs, increasing the maximum amount of the rebate from \$4,354 to \$7,500 per child per year. As the chart in the Commission's Issues Paper on page 21 shows, the operation of the two subsidies results in a child care costs being equal in relative income terms across the salary levels so ACCI believes there is some scope to move at the upper income levels.

The government should examine options for tightening the means testing for CCB and introducing means testing for the CCR. Child care is potentially a stronger contributor to workforce participation than an excessive PPL scheme. However, where a household clearly has greater capacity to bear the cost of their own child care there is less policy justification in forcing the taxpayers to bear the expense.

In relation to the operation of the two subsidies generally, there may also be scope to adjust the trigger points to ensure there is more financial benefit for women on low to medium incomes to increase their hours per week without being financially worse off.

ACCI notes that at least some stakeholders have called for a combining of the benefit and rebate to deliver a single subsidy, while others have pushed for tax deductibility to replace rebates and benefits. These ideas would be supported by ACCI if there was evidence that it would be more efficient, but not if it leads to greater investment by government.

4.5.2 Employer Supplied Child Care

Currently, the combined impact of the FBT laws and the operation of the subsidies makes child care paid for by employers financially unattractive to all but a very small percentage of parents. ACCI has a long established policy position in support of reducing or eliminating the fringe benefits tax which currently is applied in all cases of employer “provided” child care except where the child care is on the employer’s premises. This has been (often incorrectly) interpreted as physically part of the existing employer premises, which has reduced its applicability to only the very large companies.

Ideally, all child care paid for by employers out of pre-tax earnings should be FBT exempted. At the very least, the definition of “employer’s premises” should be broadened and employers educated about what could be provided in the context of a salary-sacrifice package. This will ensure that small to medium sized, as well as larger businesses, can offer this attractive benefit to employees.

Although the “cost” of removing the FBT on child care paid for by the employer may be calculated by Treasury as costly in terms of PAYG foregone, we would encourage the Productivity Commission to do economic modelling on the proposal. This would take into account the positive impact that such a proposal may have on accessing less child care subsidies, as well as the potential to increase the tax on total income due to increased working hours of the parent that would be enabled by having readily accessible and more affordable child care arrangements. Another way of looking at this issue is to suggest that if a female employee elects not to work due to the poor financial case of doing so, then PAYG is foregone anyway.

The other important area that needs to be addressed with employer provided child care is risk. Many employers (and their insurers) are not comfortable in assuming the “risk” of child care as it is not their core business. Legal liability issues should be clarified such that the employer could outsource the provision of child care to a

properly registered and regulated care supplier which is set up and prepared to assume the risk.

4.5.3 Child Care Workforce

Under the previous government, there was a successful push by the Child Care unions and the Union movement generally to increase the wages of child care workers on the basis of gender equity. Referring to one of the contextual issues about the direct nexus between the cost of the child care workforce and the impact on the decision of women to not work as child care is unaffordable, it is not inaccurate to say that a push for gender equity in one area has created barriers to the gender equity in another part of the labour force. This is an ongoing tension which exists within most labour-intensive industries, but is particularly acutely felt in child care arrangements. There are no simple answers, except to strongly caution against any further wage adjustment on equity grounds. Instead industry and economy affordability are primary considerations along with adjustments in line with wages generally.

4.5.4 Regulation

ACCI supports a review of the significant red-tape burden which has increased substantially since the implementation of the national quality framework. This review should follow the principles that the Abbott Government is currently using in its overall review of red tape, balancing cost of regulation against benefit. There is no doubt that parents are and will continue to be concerned that their children are being cared for appropriately, being mindful of their emotional, learning and physical (including safety) needs. However, with child care, there is also a context that parents themselves are not often trained for the task (as many would attest to when they first have children!) and family choices of carers and babysitters are completely unregulated, which is a risk balanced off against the loving and personal environment.

The standards should not set the bar of compliance so high that affordability of child care is significantly impacted. As an example, one of the most controversial aspects of the new framework has been the need for qualifications. ACCI is a leading advocate of the benefit of skills training, as training which results in higher workplace productivity is clearly supported by business. However, there are limits to labour productivity gains in a labour intensive child care industry due to carer/child ratios and other regulatory requirements. With the driver of wage increases equity rather than productivity, it also needs to be acknowledged that the qualifications issue and wage rate pressures are not unconnected, given that higher minimum

qualifications for educators and trainers is a major goal of the education unions in all sectors and the child care sector is not immune from this. ACCI recognises that these observations need to be balanced by recognising the importance of the child care sector being an attractive career option. It is finding the point where the balance is struck which is important in the context of this review.

4.5.5 Nannies

Particularly in the context of a means tested subsidy approach, ACCI supports the inclusion of consideration of nannies attracting child care subsidies in this review of child care arrangements. Australia should not be uncomfortable in supporting the needs of the higher paid working parents that may consider a nanny should the means tested subsidies be available to them. Given the commentary about skills utilisation, it is in Australia's economic interest and in terms of the ROI on skills development to remove barriers to workforce participation of highly skilled, higher paid working women. The key attractiveness of nannies for people in highly demanding, skilled jobs is flexibility to the needs of the individual and family. Any person who works long hours, or has unpredictable job demands at any time of the day, would testify that the mad dash to the long day care centre by closing time is one of life's most stressful experiences. Nannies can far better accommodate uncertain hours and demanding jobs, as the arrangements can and should be flexibly negotiated. There would need to be some regulatory oversight, including some form of registration system and compliance monitoring to ensure the parents as employers are tax and legally compliant.

4.6 Introducing New or Upgraded Options

The commentary on the existing landscape will only go so far, and will not achieve the quantum leap in participation needed to secure the productivity, skills utilisation and economic benefits that could be available. ACCI puts forward two options for consideration, but encourages the Productivity Commission to explore and stimulate discussion on what other child care options could be added to the existing landscape to achieve the desired outcomes.

4.6.1 Au Pairs

The pressures on working parents are not just limited to child minding, but also are about the dramatic increase in household duties that comes with having children – extra laundry, cleaning and cooking to name but a few areas. Already canvassed by some stakeholders, and worthy of strong consideration is a shift in policy to enable a significant increase in access to Au Pairs. Although there may be different

definitions of an au pair, by this term ACCI is referring to people from other countries willing to work as live in child carers and housekeepers. Au pairs are widely used successfully in other countries, and although in some countries there are issues of concern, in a country such as Australia suitable regulatory oversight should provide a win-win outcome for the worker and the stressed household.

Currently, au pairs in Australia are used within the context of an existing Working Holiday Maker visa. This visa's objective is about cultural exchange for young people combining work with travel, and is too limited in terms of the consistent and medium term arrangements needed for child care. For example, the WHM visa only allows visa holders to stay with the one employer for six months, and has a maximum of one year except in limited circumstances relating to agricultural work.

ACCI understands the issue of use of foreign workers in this way may raise the concerns of some. However, if the scheme includes elements such as the following, these concerns could be minimised:

- The au pairs should be paid according to the minimum wage and national employment standards.
- Suitable workplace health and safety standards should apply in accordance with existing WHS laws.
- There should be a deduction allowable to cover food and accommodation expenses, but this should be capped so that the wage remaining is fair and reasonable.
- There should be a specialist visa for au pairs which permits work in Australia for up to 3 years and does not lead to permanent residency. This visa could only be applied for in person at an Australian embassy in the origin country or via another means which ensures the person is aware of their rights through the receipt of information in their own language.
- A simple register system should also enable the visa holder to leave a situation that is not suitable and is not forced to return home immediately but has time (as per 457 visa, perhaps 3 months) to find alternative employment. This will substantially reduce the risk of the au pair being threatened into staying in an unsatisfactory arrangement.
- Parent(s) would need to register to host an au pair and demonstrate for example that the accommodation and situation is appropriate.
- Parents using au pairs should not be entitled to child care subsidies which would differentiate the au pair from the registered nanny.
- There should be a limit to only one family utilising the services of the au pair, or if more than one family a limited number of children (say 3).
- Using the scheme would be at the family's risk.
- Host parents as employers found to be exploiting the scheme and worker will be denied access to the scheme, and further penalties could be considered.

Such a scheme could be trialled using a limited number of origin countries to ensure that any concerns are addressed. For reasons of regional engagement, these trial countries could be in Asia and the Pacific, although ACCI has no fixed view, as global engagement is our overriding philosophy.

It is important to note that apart from flexibility benefits, both nannies and au pairs are particularly beneficial when there are two or more children requiring child care in the one family. The Au Pair scheme would also have a significant extra benefit of cultural exchange and economic support for the economies of neighbouring countries.

4.6.2 HECs style loans

Although working parents need to access various forms of child care arrangements over a long period of time (commonly from birth until the teenage years, depending on the spread of ages of the children), the intense expense in child care is when one or more children are under the age of five. The Productivity Commission should examine the feasibility of introducing child care loans which could be made available to parents and modelled along the HECS loans for higher education. Access to these loans, which would be integrated within the whole subsidy framework, should change the financial case for women weighing up their options to work full time, part time or at all. For many women, the opportunity to work longer hours, or stay on their current career path will reap medium to long term benefits in terms of higher salary and promotional opportunities.

HECs style loans will enable the intense 3 to 5 year cost of child care to be spread over a longer period to time, and be paid back when the peak cost of child care is behind them and career earnings have continued.

5. EARLY CHILDHOOD LEARNING

ACCI supports the COAG agreement to provide early childhood learning for a minimum of a year before school commencement for all Australian children, and notes the progress in achieving this target. This commitment to ensuring children's learning is off to an good start, and one that is accessible to all, is something that an advanced economy such as Australian should take as a given, provided the evidence continues to support its benefit. Certainly, the existing evidence is promising. Certainly, it would seem logical that a young child with the experience of pre-school can face school with more confidence as well as more social and learning skills.

February 2014



ACCI on behalf of the Australian business community has been expressing increasing concern for some time at the language, literacy and numeracy standards of school leavers, and their employability in the workplace. Addressing these concerns requires a whole-of-education system response, with early childhood learning playing its part. In addition to LLN skills, there is no doubt that interpersonal skills including socialisation skills including getting on with others and teamwork, are critically important to employers. Social skills are established through early learning experiences.

Australia needs to continue to be mindful of its international competitiveness in relation to access to a highly educated workforce, and in many of the international measures, Australia's place is declining in a relative sense as more countries increase their investment in their education and training systems.

Apart from these outcomes driven comments, ACCI will be more of a keen observer of the commentary to and by the Productivity Commission on early learning approaches and evidence.

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AUSTRALIAN MADE, AUSTRALIAN GROWN CAMPAIGN SUITE 105, 161 PARK STREET SOUTH MELBOURNE VIC 3205 T: 03 9686 1500 F: 03 9686 1600 E: ausmade@australianmade.com.au www.australianmade.com.au	AUSTRALIAN MINES & METALS ASSOCIATION LEVEL 10, 607 BOURKE STREET MELBOURNE VIC 3000 T: 03 9614 4777 F: 03 9614 3970 E: vicamma@amma.org.au www.amma.org.au	AUSTRALIAN PAINT MANUFACTURERS' FEDERATION Suite 604, Level 6, 51 Rawson Street EPPING NSW 2121 T: 02 9876 1411 F: 02 9876 1433 E: office@apmf.asn.au www.apmf.asn.au
AUSTRALIAN RETAILERS' ASSOCIATION LEVEL 10, 136 EXHIBITION STREET MELBOURNE VIC 3000 T: 1300 368 041 F: 03 8660 3399 E: info@retail.org.au www.retail.org.au	AUSTRALIAN SELF MEDICATION INDUSTRY Suite 2202, Level 22, 141 Walker Street North Sydney NSW 2060 T: 02 9922 5111 F: 02 9959 3693 E: info@asmi.com.au www.asmi.com.au	BUS INDUSTRY CONFEDERATION LEVEL 2, 14-16 BRISBANE AVENUE BARTON ACT 2600 T: 02 6247 5990 F: 02 6230 6898 E: enquiries@bic.asn.au www.bic.asn.au
CONSULT AUSTRALIA LEVEL 6, 50 CLARENCE STREET SYDNEY NSW 2000 T: 02 9922 4711 F: 02 9957 2484 E: info@consultaustalia.com.au www.consultaustalia.com.au	HOUSING INDUSTRY ASSOCIATION 79 CONSTITUTION AVENUE, CAMPBELL ACT 2612 T: 02 6245 1300 F: 02 6257 5658 E: enquiry@hia.com.au www.hia.com.au	LIVE PERFORMANCE AUSTRALIA LEVEL 1, 15-17 QUEEN STREET MELBOURNE VIC 3000 T: 03 9614 1111 F: 03 9614 1166 E: info@liveperformance.com.au www.liveperformance.com.au
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