

Due to the brief time that I have had to review this, I will only comment on concerns I have examined, however, I fear that there are a number of other issues that will be present in this draft.

My first concern is with regard to Chapter 1 Part 1-2 Division 2 Section 6 “The Dictionary” and the definition for “stillborn.” This definition does not provide adequate exclusion of procured miscarriage/abortions as some such cases are listed as stillbirths on the birth register, despite the so-called stillbirth being the result of a deliberate action. The current definition provides a loophole for those with no intention of having children to become eligible for the paid leave.

My second concern is to do with eligibility testing, for it does not include the partner’s income in the test for a claimant. Therefore, a person can claim for PPL on the basis that they earn less than the prescribed limit (currently \$150,000) even if their partner well in excess of this amount.

Thirdly, it seems (unless I missed something) that there is nothing preventing the claimant from placing the child into a childcare facility for any time of less than 12 hours per day, and claiming child care rebate at the same time. I was under the impression that this was to encourage parents to have children and care for their child by lessening the financial burden, rather than additional child care support scheme.

Thank you for your considerations.