AUSTRALIAN CHAMBER OF COMMERCE AND INDUSTRY

ACCI SUBMISSION

Parliamentary Joint Committee on Corporations and Financial Services

Inquiry into the Superannuation Legislation Amendment (Further MySuper and Transparency Measures) Bill 2012

October 2012

ABN 85 008 391 795

Canberra Office
COMMERCE HOUSE
24 Brisbane Avenue
Barton ACT 2600

PO BOX 6005 Kingston,
ACT 2604 AUSTRALIA

T: 02 6273 2311
F: 02 6273 3286
E: info@acci.asn.au

Melbourne Office
Level 3, 486 Albert Street
East Melbourne VIC 3002

PO BOX 18008 Collins Street
East Melbourne
VIC 8003 AUSTRALIA

T: 03 9668 9950
F: 03 9668 9958
E: melb@acci.asn.au

W: www.acci.asn.au

1. ABOUT ACCI

1.1 Who We Are

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

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

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

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

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

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

1.2 What We Do

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

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

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

Our specific activities include:

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

TABLE OF CONTENTS

1. ABOUT ACCI III
1.1 Who We Are iii
1.2 What We Do iii
2. INTRODUCTION 1
3. KEY ISSUES 2
4. ACCI MEMBERS 9
CHAMBERS OF COMMERCE & INDUSTRY 9
NATIONAL INDUSTRY ASSOCIATIONS 10

2. INTRODUCTION

1. ACCI welcomes the opportunity to comment on the Superannuation Legislation Amendment (Further MySuper and Transparency Measures) Bill 2012 (the Bill). The Bill is one of a number of tranches of legislation to give effect to the implementation of many of the Cooper Committee recommendations[1] concerning the reform of default superannuation (MySuper). The Bill is not the last of these and is technical.

2. "Default" superannuation is itself not a simple concept. For employers "default" essentially means a contribution made into a fund which was not chosen by the employee. For funds "default" means contributions received for which the member has not directed an investment regime. These two notions of default are not symmetrical. An employer's contribution into a "chosen" fund can be a default contribution to the receiving fund because it is allocated to the fund's default investment option. A contribution by an employer into its default fund may be allocated by the fund as directed by the member and not be allocated into its default investment.

3. Adding to this difficulty is the fact that in part the Bill proposes to amend the effects of another bill, the Superannuation Legislation Amendment (MySuper Core Provisions) Bill 2012 (MySuper Core Provisions Bill) which passed the House of Representatives on 22 August 2012. The MySuper Core Provisions Bill was introduced into the Senate on 10 September 2012. It proposes to amend the Superannuation Guarantee (Administration) Act 1992 (SGA Act) and the Superannuation Industry (Supervision) Act 1993 (SIS Act) to insert a number of new MySuper provisions affecting employers and funds respectively.

4. Passage of the MySuper Core Provisions Bill through the House included some last minute amendments. ACCI is not supportive of the "anti-flipping" amendments accepted by the Government. ACCI is of the view that the perception that a fund would provide a "loss leader" tailored MySuper product to a large employer so as to be able to "flip" terminating employees into its high cost generic MySuper product (of which it can only have one) fails to take sufficient account of the significance of scale as a criterion for authorisation to offer a MySuper product.

[1] Review into the governance, efficiency, structure and operation of Australia's superannuation system

5. The "flipping" amendment means that an employee can go to a rival employer, indeed, be poached by the rival employer, and retain the beneficial superannuation of the first employer.

6. The timing for MySuper obligations coming into effect was also changed with the passage of the MySuper Core Provisions Bill through the House. Trustees' obligations to allocate default contributions (contributions for which there has been no member instruction about investment) into a MySuper product and employers' obligations to make default contributions (contributions for which there is no "chosen" fund) into a fund offering a MySuper product would now commence 1 January 2014 (rather than 1 October 2013) under the bill now before the Senate.

7. ACCI has no objection to the later implementation and recognizes the need for funds to have properly prepared and authorized product before MySuper obligations should start. However, ACCI does wish to comment on the timing of MySuper and aspects of Schedule 4 of the Bill.

8. ACCI's submission is confined to those matters which impact on employers. ACCI is supportive of the objectives of greater transparency and comparability of funds, and driving down costs in superannuation, but it does not seek to comment on the detail of the proposed amendments.

3. KEY ISSUES

Schedule 4

9. Schedule 4 of the Bill, "Modern awards and enterprise agreements", proposes to amend the Fair Work Act 2009 (FW Act) to provide that both modern awards and enterprise agreements prescribe only funds which offer a MySuper product. The intent is that superannuation obligations under awards and agreements are not inconsistent with MySuper obligations under superannuation legislation after they commence.

10. Amendments of this kind are clearly necessary to avoid creating two separate obligations, or mislead as to obligations. This is important. The modern awards objective (s 134(1) of the FW Act) recognizes the need to "…ensure a simple, easy to understand, stable and sustainable modern award system…". In practice employers look to the award to identify whether or not a fund is a "permitted default" (a

fund nominated by the award clause into which contributions can be made if the employee does not have a chosen fund). Award-covered employers are not generally aware of other sources of regulation of what can and can't be a default fund and do not use other sources to determine this issue. It is imperative for the award to be both correct and not misleading.

11. Subject to the caveats below, passage of Schedule 4 is supported.

12. Fair Work Australia is not varying modern awards to insert the names of new default funds. If a modern award prescribes a "permitted default" fund which does not offer a MySuper product it will do so because it continues to prescribe an existing "default" fund and employers contributing into that fund will continue to do so because the award continues to prescribe it.

13. Item 6 of Schedule 4 proposes a new s 155A to be inserted into subdivision D of Part 2-3 of the FW Act, "Terms that must not be included in modern awards". Proposed s 155A(1) provides that a modern award must not contain a term which has the effect of requiring or permitting contributions into a fund or scheme specified in the award unless the fund or scheme offers a MySuper product or is an Exempt Public Sector Superannuation Scheme (EPSSS).

14. S 137 of the FW Act provides that terms which must not be included in a modern award (terms identified under subdivision D of Part 2-3 of the FW Act) have no effect. However, the fact that an award nominated fund which does not offer MySuper has no statutory effect does not address the problem. The point is that the "permitted default" fund continues on the written face of the award and there has been no formal excision or update of that fact. If modern awards are not varied to remove references to funds which do not offer a MySuper product numbers of employers will follow the award. This will give rise to widespread guarantee charges and in some cases also to breaches of the charge notification requirements because the employer will be unaware of the breach within the following month.

15. Item 8 of Schedule 4 (amendments to Schedule 1 the FW Act) proposes a new s 11 to require Fair Work Australia to vary modern awards so that they do not contain terms which require or permit default contributions into funds which do not offer MySuper or are an EPSSS. However proposed s 11 proposes that this is to be done by 1 January 2014. Under proposed s 9 the award's amended

superannuation provisions would take effect for contributions from 1 January 2014.

16. Under the MySuper Core Provisions Bill the requirement for employers to make default contributions into a fund offering MySuper applies to all default contributions, not just those made to offset a superannuation guarantee charge. The standard modern award superannuation provision also requires that employee voluntary contributions (non-concessional contributions deducted and paid by the employer on behalf of the employee) are to be made into the award's "permitted default" (unless there is a chosen fund) no later than 28 days after the month the deduction was made. Depending on the enterprises' pay period cycle December deductions would be often paid in January.

17. Many employers pay superannuation guarantee contributions more frequently than the quarterly payment required to offset the superannuation guarantee charge. ATO commissioned research reports that 63% of employers make superannuation contributions more frequently than quarterly, with the majority (58%) paying monthly.[2]

18. ACCI seeks amendment to proposed s 11 (item 8 of the Bill) so that Fair Work Australia is to vary modern awards so that they identify only "permitted default" funds which offer MySuper (or are EPSSSs) by 1 October 2013 with effect for contributions from 1 January 2014. This will mean, allowing time for information to flow, that there is a period of somewhat less than 3 months for employers currently contributing into an award "permitted default" fund which is not authorized to offer a MySuper product to organize a new default and set up contributions so as to meet the 1 January 2014 commencement date.

19. A 3 month period for employers to establish a new default and contributions arrangement is recognized in other parts of the legislation. For example, item 12 of the MySuper Core Provisions Bill proposes a 3 month "grace period" following notification by APRA that an application for a large employer fund MySuper product has been refused.

20. APRA's determination of which funds are authorized to offer MySuper will have the effect of either retaining the current list of "permitted

[2] P 44, Figure 24, Super reforms research: *Employers quantitative findings*, prepared for the ATO, Colmar Brunton Social Research, released June 2012.

default" funds in a modern award or reducing it, so that an employer moving to another fund in the award before 1 January 2014 will not give rise to breach.

21. The Bill does not explicitly contemplate new funds being added after 1 January 2014, but does not seem to preclude it. Funds which are authorised "late" could be added to an award after 1 October, although the proposed 1 October amendment date would act to motivate generic funds to have their applications approved prior to that date.

22. The outcome of the inquiry into default funds in modern awards by the Productivity Commission will not be known during the passage of this legislation and its implications should not be anticipated. However, if the Committee were of the view that there may be new funds inserted into modern awards before 1 January 2014 (in which case default contributions into that new fund before 1 January 2014 would breach the award) item 11 could be varied to have an operative date of 1 October 2013 with a savings provision until 1 January 2014 for funds contributed into prior to 1 October.

23. Proposed s 155A also deals with APRA subsequently revoking authorisation to offer a MySuper product or becoming aware that an EPSSS no longer offers MySuper. APRA must advise Fair Work Australia in writing and the tribunal must rescind the reference to the fund as soon as practicable. This is supported. ACCI expects that Fair Work Australia would proceed by advising parties with an interest in the award of the proposed amendment, so as to enable any issues about timing of the amendment to be addressed.

24. Item 5 of Schedule 4 proposes to insert a new s 149A into Subdivision C of Part 2-3 of the FW Act, "Terms that must be included in modern awards", which would require a modern award to contain a term permitting an employer to contribute to a defined benefit fund for a member of it. The reason why contributions to defined benefit funds must be permitted is that a defined benefit fund will be the default (non-chosen) fund for numbers of employees but defined benefit funds are exempt from MySuper requirements.

25. This is appropriate and supported. Proposed s 155A essentially provides capacity to nominate funds in awards and it would not be appropriate for defined benefit funds (which operate in individual firms) to be named in modern awards of general application across the private

sector, as would be the consequence if contributions into defined benefit funds were included in the proposed s 155A.

26. Proposed s 10 (Item 8 of Schedule 4) proposes that Fair Work Australia vary awards to give effect to proposed 149A by 31 December 2013. It might be convenient for this to be amended to 1 October 2013 for consistency with the proposed amendment to proposed s 11.

27. The MySuper Core Provisions Bill also provides for large employer funds to apply for authorization to offer MySuper product tailored to the employer's workforce and allows continuing contributions whilst APRA determines the matter. ACCI proposes the Committee consider recommending an amendment to item 5 so that modern awards contain a provision permitting contributions to a large employer fund offering a MySuper product in the same way as for defined benefit funds (and during the approval period dealt with under item 12(4) of the MySuper Core Provisions Bill).

Schedule 5

28. Schedule 5 of the Bill, "Defined benefit members", deals with defined benefit funds and schemes. It is not intended that employer contributions made for members of a defined benefit fund (defined benefit members) are subject to the MySuper requirements, primarily because the investment risk in a defined benefit fund is borne by the employer and not the member. The SGA Act defines a defined benefit member as someone whose retirement benefit is wholly or partly calculated by reference to the person's salary or some other identified amount. A member's interest need not wholly be calculated by reference to his or her salary or other amount for the member to be a defined benefit member.

29. Hybrids, funds where there is a defined benefit interest supplemented by an accumulation interest, are a legacy of the impact of various changes to superannuation obligations since the late 1980s on various pre-existing defined benefit arrangements. For this reason hybrid funds do not possess uniform structures or rules.

30. Defined benefit funds and schemes are an important part of the overall superannuation system, particularly in their hybrid form. APRA reports that at 30 June 2011 there were 18 non-public sector defined benefit funds with 10,000 members and $M 580 in assets and a further 88 hybrid non-public sector funds with 5,798,000 members and $M

210,412 in assets.[3] (Overall APRA reports that there were 30,478,000 fund members (accounts) and $M 889,487 in assets at that time.)

31. Fund costs, such as administration or investment costs are not easily attributable between the defined benefit and accumulation components of a hybrid. ACCI understands that the intention of Schedule 5 is to exclude contributions into both defined benefit funds and hybrids from the MySuper requirements.

32. Item 10 of Schedule 5 proposes to amend s proposed s 29WA(1)(a) of the SIS Act[4] which in its current form requires trustees to allocate obligations for default contributions (contributions for which the member has not given written instructions about investment) into a MySuper product by excluding contributions on behalf of a defined benefit member from this obligation. This will also cover contributions into the accumulation component of a hybrid for these members and is supported.

33. Some hybrid funds may have members who are accumulation members only and who therefore do not fall within the definition of defined benefit member. Schedule 5 also proposes to amend the requirement in the MySuper Core Provisions Bill that there must be at least 500 members in a large employer fund which offers an employer specific MySuper product by excluding defined benefit members of that fund from the count. Items 7 and 8 of Schedule 5 propose to amend proposed s 29TB(1)(d)(i) and (ii) of the SIS Act to this effect. Item 7 of Schedule 4, which would allow an enterprise agreement to nominate a defined benefit fund, including a hybrid, proceeds on the basis that if there is an employee member of the hybrid who is accumulation only the fund cannot be nominated in the agreement.

34. ACCI does not know the extent to which there may be a problem but it would be concerned if requiring the non-defined benefit members of a hybrid to be transferred into another fund offering a MySuper product impacted negatively on investment costs of the hybrid, or the total costs to the accumulation member.

35. Items 2 and 6 of Schedule 5 propose to insert a regulation making power into the SGA Act (concerning employer contributions) and the SIS Act (concerning trustee investment obligations) respectively to provide that a member who is otherwise excluded from the definition

[3] P 41, Table 15, *Structure of Retirement Benefits*, *Statistics – Annual Superannuation Bulletin, June 2011*, APRA

[4] Item 9 of the MySuper Core Provisions Bill

of defined benefit member may subject to some or all defined benefit provisions and vice versa. The capacity to adjust the definition of defined benefit member to address a potential for negative impact on the hybrid or accumulation members is supported.

4. ACCI MEMBERS

CHAMBERS OF COMMERCE & INDUSTRY

ACT AND REGION CHAMBER OF COMMERCE & INDUSTRY

12A THESIGER COURT
DEAKIN ACT 2600
T: 02 6283 5200
F: 02 6282 2436
E: chamber@actchamber.com.au
www.actchamber.com.au

BUSINESS SA

ENTERPRISE HOUSE
136 GREENHILL ROAD
UNLEY SA 5061
T: 08 8300 0000
F: 08 8300 0001
E: enquiries@business-sa.com
www.business-sa.com

CHAMBER OF COMMERCE & INDUSTRY QUEENSLAND

INDUSTRY HOUSE
375 WICKHAM TERRACE
BRISBANE QLD 4000
T: 07 3842 2244
F: 07 3832 3195
E: INFO@CCIQ.COM.AU
www.cciq.com.au

CHAMBER OF COMMERCE & INDUSTRY WESTERN AUSTRALIA

180 HAY STREET
EAST PERTH WA 6004
T: 08 9365 7555
F: 08 9365 7550
E: info@cciwa.com
www.cciwa.com

CHAMBER OF COMMERCE NORTHERN TERRITORY

CONFEDERATION HOUSE
SUITE 1, 2 SHEPHERD STREET
DARWIN NT 0800
T: 08 8982 8100
F: 08 8981 1405
E: darwin@chambernt.com.au
www.chambernt.com.au

NEW SOUTH WALES BUSINESS CHAMBER

LEVEL 15, 140 ARTHUR STREET
NORTH SYDNEY NSW 2060
T: 132696
F: 1300 655 277
E: NAVIGATION@NSWBC.COM.AU
www.nswbc.com.au

TASMANIAN CHAMBER OF COMMERCE & INDUSTRY

30 BURNETT STREET
NORTH HOBART TAS 7000
T: 03 6236 3600
F: 03 6231 1278
E: admin@tcci.com.au
www.tcci.com.au

VICTORIAN EMPLOYERS' CHAMBER OF COMMERCE & INDUSTRY

486 ALBERT STREET
EAST MELBOURNE VIC 3002
T: 03 8662 5333
F: 03 8662 5462
E: vecci@vecci.org.au
www.vecci.org.au

NATIONAL INDUSTRY ASSOCIATIONS

ACCORD – HYGIENE, COSMETIC AND SPECIALTY PRODUCTS INDUSTRY

FUSION BUILDING SUITE 4.02,
LEVEL 4,
22-36 MOUNTAIN STREET
ULTIMO NSW 2007
T: 02 9281 2322
F: 02 9281 0366
E: emifsud@accord.asn.au
www.accord.asn.au

AGRIBUSINESS EMPLOYERS' FEDERATION

250 FOREST ROAD
LARA VIC 3215
T: 03 5272 9223
F: 03 5274 2084
E: aef@aef.net.au
www.aef.net.au

AIR CONDITIONING & MECHANICAL CONTRACTORS' ASSOCIATION

30 CROMWELL STREET
BURWOOD VIC 3125
T: 03 8831 2800
F: 03 9888 8459
E: natamca@amca.com.au
www.amca.com.au

AUSTRALIAN BEVERAGES COUNCIL

LEVEL 1, SUITE 4
6-8 CREWE PLACE
ROSEBERRY NSW 2018
T: 02 9662 2844
F: 02 9662 2899
E: info@australianbeverages.org
www.australianbeverages.org

AUSTRALIAN DENTAL INDUSTRY ASSOCIATION

LEVEL 5, 757 ELIZABETH STREET
ZETLAND NSW 2017
T: 02 9319 5631
F: 02 9319 5381
E: NATIONAL.OFFICE@ADIA.ORG.AU
www.adia.org.au

AUSTRALIAN FOOD & GROCERY COUNCIL ASSOCIATION

LEVEL 2, SALVATION ARMY BUILDING
2-4 BRISBANE AVENUE
BARTON ACT 2600
T: 02 6273 1466
F: 02 6273 1477
E: info@afgc.org.au
www.afgc.org.au

AUSTRALIAN HOTELS ASSOCIATION

LEVEL 4, COMMERCE HOUSE
24 BRISBANE AVENUE
BARTON ACT 2600
T: 02 6273 4007
F: 02 6273 4011
E: aha@aha.org.au
www.aha.org.au

AUSTRALIAN INTERNATIONAL AIRLINES OPERATIONS GROUP

C/- QANTAS AIRWAYS QANTAS CENTRE
QCA4, 203 COWARD STREET
MASCOT NSW 2020

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

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@consultaustralia.com.au
www.consultaustralia.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

AUSTRALIAN SELF MEDICATION INDUSTRY (ASMI)

SUITE 2202, LEVEL 22, 141 WALKER STREET
NORTH SYDNEY, NSW, 2060
T: (02) 9922 5111
E: info@asmi.com.au
www.asmi.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

MASTER BUILDERS AUSTRALIA LTD

LEVEL 1, 16 BENTHAM STREET
YARRALUMLA ACT 2600
T: 02 6202 8888
F: 02 6202 8877
E: enquiries@masterbuilders.com.au
www.masterbuilders.com.au

MASTER PLUMBERS' & MECHANICAL SERVICES ASSOCIATION OF AUSTRALIA (THE)

525 KING STREET
WEST MELBOURNE VIC 3003
T: 03 9329 9622
F: 03 9329 5060
E: info@mpmsaa.org.au
www.plumber.com.au

NATIONAL BAKING INDUSTRY ASSOCIATION

BREAD HOUSE
49 GREGORY TERRACE
SPRING HILL QLD 4000
T: 07 3831 5961
E: nbia@nbia.org.au
www.nbia.org.au

NATIONAL FIRE INDUSTRY ASSOCIATION

PO BOX 2466
WERRIBEE NSW 3030
T: 03 9865 8611
F: 03 9865 8615
E: INFO@NFIA.COM.AU
www.nfia.com.au

NATIONAL RETAIL ASSOCIATION

PO BOX 1544
COORPAROO DC QLD 4006
T: 07 3240 0100
F: 07 3240 0130
E: info@nra.net.au
www.nra.net.au

OIL INDUSTRY INDUSTRIAL ASSOCIATION

C/- SHELL AUSTRALIA
GPO BOX 872K
MELBOURNE VIC 3001
F: 03 9666 5008

PHARMACY GUILD OF AUSTRALIA

LEVEL 2, 15 NATIONAL CIRCUIRT
BARTON ACT 2600
T: 02 6270 1888
F: 02 6270 1800
E: guild.nat@guild.org.au
www.guild.org.au

PRINTING INDUSTRIES ASSOCIATION OF AUSTRALIA

25 SOUTH PARADE
AUBURN NSW 2144
T: 02 8789 7300
F: 02 8789 7387
E: info@printnet.com.au
www.printnet.com.au

RESTAURANT & CATERING AUSTRALIA

SUITE 17, 401 PACIFIC HIGHWAY
ARTARMON NSW 2064

T: 1300 722 878
F: 1300 722 396
E: restncat@restaurantcater.asn.au
www.restaurantcater.asn.au

VICTORIAN AUTOMOBILE CHAMBER OF COMMERCE

LEVEL 7, 464 ST KILDA ROAD
MELBOURNE VIC 3004
T: 03 9829 1111
F: 03 9820 3401
E: vacc@vacc.asn.au
www.vacc.com.au

NATIONAL ELECTRICAL & COMMUNICATIONS ASSOCIATION

LEVEL 4, 30 ATCHISON STREET
ST LEONARDS NSW 2065
T: 02 9439 8523
F: 02 9439 8525
E: necanat@neca.asn.au
www.neca.asn.au

PLASTICS & CHEMICALS INDUSTRIES ASSOCIATION

LEVEL 10, 10 QUEEN STREET
MELBOURNE VIC 3000
T: 03 9611 5412
F: 03 9611 5499
E: info@pacia.org.au
www.pacia.org.au