



AUSTRALIAN CHAMBER OF
COMMERCE AND INDUSTRY



ACCI SUBMISSION

Senate Education, Employment
and Workplace Relations Legislation Committee

Inquiry into the Equal Opportunity for Women in the
Workplace Amendment Bill 2012

MARCH 2012

Senate Education, Employment and Workplace Relations
Legislation Committee Inquiry – Equal Opportunity for Women in the
Workplace Amendment Bill 2012

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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
- 28 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.

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2. INTRODUCTION

1. The Australian Chamber of Commerce and Industry (ACCI) welcomes the opportunity to provide a written submission in relation to the Committee's inquiry into the Equal Opportunity for Women in the Workplace Amendment Bill 2012 (the Bill)
2. This submission is made without prejudice to ACCI or its members' views.

3. KEY ISSUES

Background

3. The Equal Opportunity for Women in the Workplace Amendment Bill 2012 (the Bill) makes significant amendments to the *Equal Opportunity for Women in the Workplace Act 1999* (the Act).
4. ACCI's submission to the review of the Act was made in October 2009 in response to the Office for Women's Issues Paper and is attached (**Attachment A**). The submission is relevant in the context of the Committee's current inquiry.
5. In addition to the written submission, ACCI also engaged with KPMG who conducted the review on the operation of the existing laws.
6. More recently, ACCI was invited to participate on the Implementation Advisory Group (IAG) which involved confidential meetings on the development of the proposals based on a Government fact sheet outlining proposed changes to the existing framework.¹

Policy Goals and Policy Principles

7. ACCI supports workable and sensible policy measures which have the capacity to make a real improvement to enhancing gender equality.
8. Such measures do not necessarily involve additional or new legal obligations. Simple and effective measures include national campaigns, working with industry to develop voluntary codes and guidelines, further education to the wider community, and building capacity for industry to develop their own tailored arrangements that meets the unique circumstances of the industry and enterprise.
9. ACCI's media release following the introduction of the Bill into the House of Representatives is attached for the Committee's further information (**Attachment B**).
10. A summary of recommendations in its 2009 written submission is as follows:²

¹

http://www.fahcsia.gov.au/sa/women/progserv/economic/Pages/equal_opportunity_for_Women_Bill2012.aspx

² See pp. 40 – 41.

- a. There should be consideration of whether the existing obligations are necessary to improve equity outcomes gained over the last decade. Alternative initiatives that align with the objectives under the Act, could be in the form of additional surveys, targeted and focused research and Agency reports on particular industries or cohorts of firms. This should be in addition to measures outlined in recommendation (e);
 - b. If the current obligations are to continue, there should be further consideration as to how reporting obligations can be eased for reporting firms, particularly smaller firms;
 - c. The current threshold for reporting obligations should not be lowered and industry does not support any extension of the existing obligations or the creation of new obligations;
 - d. There should be consideration of rolling over the functions of the Agency into the Office of Women;
 - e. The Agency (or its successor) should focus on providing education, advice and tools, to all firms, but give particular consideration to providing additional resources to non-reporting firms, including assisting firms to develop their own voluntary policies and initiatives in the workplace;
 - f. Initiatives to facilitate the identification (by senior management, board directors and chairmen of boards) of women who could be available or make themselves available for election to major corporate boards;
 - g. The Government jointly fund ACCI and the Agency to research and recommend a mechanism for the identification of talented small businesswomen for participation on corporate boards;
 - h. There should be a review of how particular aspects of the Government's Fair Work industrial relations system in the form of Individual Flexibility Arrangements are negatively impacting females' access to flexible working arrangements by unions placing significant restrictions on their utility;
11. Notwithstanding the above policy position, ACCI constructively engaged in the development of the measures which were announced by the Government. However, this does not mean that it supports the proposals which are before the Parliament. Consistent with ACCI's

views as outlined in its 2009 submission, ACCI did not call for additional reporting obligations, nor did it call for so called “minimum standards” to be established and imposed on reporting firms. This was based on extensive feedback to ACCI from employers preceding the Office for Women inquiry.

12. Whilst much of the existing framework has been retained, including limiting reporting obligations to medium to larger firms, the measures go above and beyond the existing requirements which will have many significant consequences. This is contrary to what ACCI recommended in 2009.

Assessing the Existing Framework

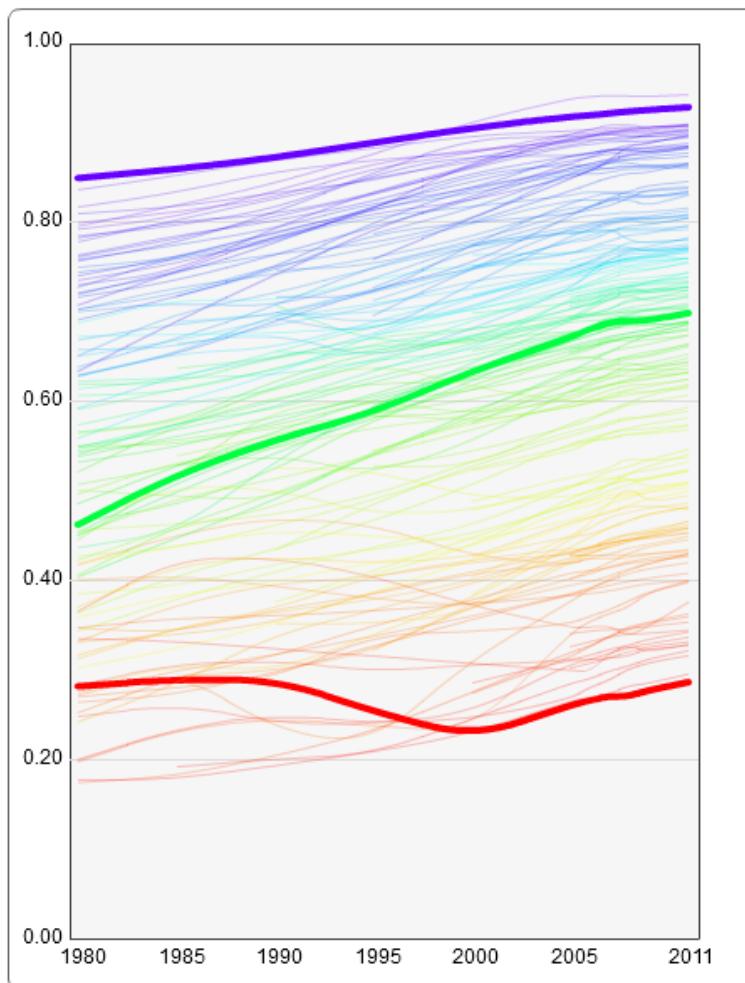
13. It is important for the Committee to put into context how well Australia is tracking internationally on key performance indicators as well as considering the existing regulatory framework:
 - a. A record number of businesses received the Equal Opportunity for Women in the Workplace “Employer of Choice for Women” citation in 2012, with 125 organizations named. This is the largest in a five year period with 55 organisations receiving the citation in October 2001;³
 - b. The United Nations “*Human Development Report*” for 2011 ranks Australia in 2nd place (behind Norway) out of 187 countries (and has improved over the last two decades);⁴

³http://www.eowa.gov.au/EOWA_Employer_of_Choice_for_Women/2012/2012%20Employer%20of%20Choice%20Statistics.pdf

⁴ <http://hdr.undp.org/en/statistics/>



Human Development Index (HDI) value



■ Australia ■ Congo (Democratic Republic of the) ■ Turkey

- c. Australia ranks 18 out of 187 countries on the Gender Inequality Index;⁵
- d. Australia ranks 23rd on the 2011 Global Gender Gap Report out of 135 countries;⁶

⁵ Ibid. The Gender Inequality Index is a composite measure reflecting inequality in achievements between women and men in three dimensions: reproductive health, empowerment and the labour market. It varies between zero (when women and men fare equally) and one (when men or women fare poorly compared to the other in all dimensions). The health dimension is measured by two indicators: maternal mortality ratio and the adolescent fertility rate. The empowerment dimension is also measured by two indicators: the share of parliamentary seats held by each sex and by secondary and higher education attainment levels. The labour dimension is measured by women’s participation in the work force. The Gender Inequality Index is designed to reveal the extent to which national achievements in these aspects of human development are eroded by gender inequality, and to provide empirical foundations for policy analysis and advocacy efforts.

⁶ http://www3.weforum.org/docs/GGGR11/GGGR11_Rankings-Scores.pdf

- e. 71% of mothers are employed after their children begin school (higher than the OECD average of 66%);⁷
- f. People in Australia work 1690 hours a year, lower than the OECD average of 1739 hours;⁸
- g. The female employment rate (66.2%) has been rising steadily since the 1960s and is now well above OECD average (59.6%), and the gender wage gap (12%) is below average (16%);⁹ However, Australia does not fare well in terms of childcare subsidy arrangements. Australia spends less on childcare services than most OECD countries: 0.4% of GDP compared with the OECD average of 0.6%. The OECD reports that “[t]his has contributed to low childcare enrolment rates for young children, with only 40% of children aged less than six years enrolled in formal childcare. Australia should consider extending its childcare support programmes to provide more help to working parents”.¹⁰
- h. Males and females have shown rising satisfaction over the course of the Australian Unity Wellbeing Index according to the latest report;¹¹
- i. Males who are full time employed have a much higher wellbeing than males engaged in full time home care, whereas there is no notable difference with female wellbeing levels;¹²
- j. The number of women on ASX 200, 100 and 50 boards and NFP has progressively increased;¹³
- k. Recently developed and implemented ASX Guidelines on diversity and gender reporting show positive signs of enhancing gender outcomes;¹⁴
- l. The female participation has increased, whilst the male rate has remained steady;¹⁵

⁷ <http://oecdbetterlifeindex.org/countries/australia/>

⁸ Ibid.

⁹ Ibid.

¹⁰ Ibid.

¹¹ Australian Unity Wellbeing Index, Survey 25, Report 25, April 2011, p.128

¹² Ibid, at p.146.

¹³ <http://www.companydirectors.com.au/Director-Resource-Centre/Governance-and-Director-Issues/Board-Diversity/Statistics>

¹⁴ http://www.asxgroup.com.au/media/PDFs/cg_principles_recommendations_with_2010_amendments.pdf

- m. The first successful test case initiated by multiple unions in the social and community services sector under new Pay Equity provisions of the *Fair Work Act 2009* has resulted in significant above award safety-net increases in excess of 40% (the increase applies to male and female employees, but will benefit females given that they are over-represented in the industry sector);¹⁶
 - n. Relatively new provisions under the *Fair Work Act 2009* allow the Fair Work Ombudsman (employee or union acting on the employee's behalf) for the first time to prosecute employers or potential employers for breaching anti-discrimination laws or taking "adverse action" for exercising a range of "workplace rights". These new protections are in addition to laws which already operate on a federal and state/territory basis which also proscribes discriminatory conduct in the workplace, including sexual harassment;
 - o. New provisions under s.65 of the *Fair Work Act 2009* allow employees to request flexible working arrangements, with an employer only able to refuse on limited grounds;
 - p. The Government's Paid Parental Leave Scheme provides up to 14 weeks of pay for eligible parents, in addition to a range of maternal and family benefits;
14. Whilst there is always room for improvement on key indicators, Australia's standing in the international community is well regarded.
15. Moreover, and as acknowledged in the KPMG EOWA Review Consultation Report:¹⁷

legislation alone does not always predict better rankings – for example, the United States has legislation in place for equal opportunity for women, but is ranked lower than in the OECD rankings than Australia (31st compared to Australia's 20th placing). It is likely that employment outcomes for women are influenced by a range of factors including regulatory effort, as well as economic participation and opportunity, educational attainment, health and survival and political empowerment.

¹⁵ ABS Cat 4125.0 - Gender Indicators, Australia, Jul 2011.

¹⁶ [2012] FWAFB 1000

¹⁷ KPMG EOWA Review Consultation Report, p.11

Assessing Impact on Reporting Firms

16. At this stage the Bill does not articulate what will be the “*gender equality indicators*” and does not set any “*minimum standards*”. These will be prescribed by the relevant Minister in the future.
17. It is therefore impossible for ACCI to conduct a proper cost-benefit analysis of the measures without this information. Firms which would be subject to the proposals will be required to collect or collate new information and make this (subject to some limitations) publicly available to both the proposed new Workplace Gender Equality Agency (WGEA), to employees, unions and to the public.
18. The collection of data, in and of itself, is a new and enhanced regulatory burden. This is unable to be quantified because it is not clear what exactly will be required to be collected and provided to the WGEA. The Committee is unable to assess the possible impact of the measures in terms of the actual new cost imposed on reporting firms, or unintended consequences, until the indicators are defined.
19. ACCI is also concerned that information which will be required to be collated may be sensitive in nature, and provided without any context, may be misleading and could damage the interests of the reporting firm.
20. When information is provided in aggregate form, this would not provide a complete picture as to the reasons behind those metrics.
21. For example, if firms were required to report on the number of sexual harassment claims (or out of court settlement/court orders issued) made against it, it would be expected that a minimum standard would require (improving against a target (ie. a lower number or quotient in a particular “industry”). However, it may be that a firm which reports a high or higher number claims per year in its report, is the result of a firm which proactively encourages staff to report such misconduct in the first instance, rather than discourage it. Numbers tell very little information in this regard and can actually be very misleading.
22. Where firms report on the number of females and males in particular cohorts of employment categories (ie. FT, PT, casual), the reasons for why staff are engaged in those categories are myriad and will undoubtedly involve different reasons for each employee. Once again, aggregate data can provide only half of the story.

23. ACCI is also concerned that some firms may legitimately decide not to disclose sensitive and detailed information to the proposed Agency if they believe there is little benefit to do so. This may be the case for a firm who believes that the industry and market circumstances restricts any real significant improvement to be gained. There is no question that the mining sector, construction, engineering and health sector have genuinely tried and will continue to attract more employees of the opposite gender. However, it may be that these firms are not able to improve or may have improved against their own internal targets but not against the Government's minimum standards.
24. ACCI believes that there should be consideration of better incentives for firms to be encouraged to improve on their own gender equality targets voluntarily, rather than being penalised with possible reputational damage in a 'name and shame' approach or financially impacted by being locked out of procurement. Business confidence in the reporting framework may be sapped if it is thought that the reporting obligations and minimum standards are too onerous or unworkable.

Consequence of Being Non-Compliant

25. If a firm is locked out of government tendering or procurement work and the firm must reduce staff numbers or hours as a direct or indirect consequence (this could be a smaller contractor reliant on the head contractor maintaining its government contract), this may put employees in a worse position and injure their employment situation.
26. Being "*named and shamed*" by publishing a firm name and details of non-compliance in a national or local newspaper and in a public report, or by not meeting arbitrarily set "*minimum standards*", by not providing information as required, or providing information which is false, is potentially very damaging to a firm. The irony would be that the non-compliant firm may actually be well regarded in the market as a result of programs, employment conditions and opportunities, developed and promoted by the firm. Why should the firm be penalised for failing to comply with Government set minimum standards which do not even apply to the Government itself?
27. The technical non-compliance by the firm may have little correlation in terms of how the firm is engaged in maintaining or improving gender equity and diversity outcomes.

Why Exclude Public Sector Employers?

28. The proposed measures do not extend to the public sector as an employer. When the *Affirmative Action (Equal Employment Opportunity for Women) Bill 1986* (AA Bill) was introduced into the Parliament on 19 February 1986 by the then Prime Minister Hon. RLJ Hawke, the Bills Digest notes:

Provisions for equal employment opportunities within the Australian Public Service have already been enacted and EEO programs are being established within Public Service Departments. Section 11(1) of the Public Service Reform Act 1984 inserted a new s.22B into the Public Service Act to provide for equal employment opportunity programs

29. The introduction of the AA Bill preceded a detailed consultation with the private sector and included a Pilot Program which commenced in July 1984 and led to a Progress Report. The AA Bill staggered the commencement of the reporting obligations based on firm size (ie. companies employment more than 1000 commenced earlier than those that had 100 employees).¹⁸
30. Under the existing framework, a Commonwealth agency head must establish a workplace diversity program to assist in giving effect to the APS Values (section 18 of the *Public Service Act 1999*).¹⁹ Under the *Equal Employment Opportunity (Commonwealth Authorities) Act 1987* there are requirements on Commonwealth authorities to also prepare similar programs. However, the kind of detailed reporting information and minimum standards are not required by such employers, and will not be required in the future under the proposed measures.
31. Internationally, it is noteworthy that New Zealand requires only imposes reporting obligations on the public sector and not the private sector. Recently, the the UN Women NZ National Committee, along with the NZ Federation of Business and Professional Women and Dr Judy McGregor, Equal Employment Opportunities Commissioner at the Human Rights Commission have launched a campaign based on the UN developed Women Empowerment Principles.²⁰

¹⁸ See section 7 of the repealed *Affirmative Action (Equal Employment Opportunity For Women) Act 1986* No. 91 of 1986.

¹⁹ See <http://www.apsc.gov.au/foundations/employmentframework.htm#workplacediversity> further:

²⁰ <http://www.hrc.co.nz/2012/getting-more-women-into-business-the-women%E2%80%99s-empowerment-principles>

32. There is a disparity between what is being told is good for business and what standards the Government and its agencies have set for itself. At a minimum, if the new measures are expected to apply to the private sector, then the private sector expects equity in the application of regulations and standards.
33. ACCI believes that the existing Act should be improved, but this is in terms of providing further consideration to the regulatory burden of the existing reporting obligations and considering non-regulatory measures to improve gender and diversity outcomes.
34. ACCI supports a principles based approach to this area, which is consistent with the recently formulated seven UN principles adopted by more than 7000 businesses in 135 countries. The Women's Empowerment Principles provide a set of considerations to help the private sector focus on key elements integral to promoting gender equality in the workplace marketplace and community.²¹ They are the result of a collaboration between the United Nations Development Fund for Women (UNIFEM, part of UN Women) and the United Nations Global Compact. The development of the Principles included an international multi-stakeholder consultation process, which was launched in March 2009.
35. The seven principles are set in the box below:

<p style="text-align: center;">UN Women's Empowerment Principles</p> <ul style="list-style-type: none">• Establish high-level corporate leadership for gender equality• Treat all women and men fairly at work — respect and support human rights and non-discrimination• Ensure the health, safety and wellbeing of all women and men workers• Promote education, training and professional development for women• Implement enterprise development, supply chain and marketing practices that empower women• Promote equality through community initiatives and advocacy• Measure and publicly report on progress to achieve gender equality.
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²¹ See further: <http://business.un.org/en/assets/b6a186be-b9b4-4218-8083-20d5138ecd79.pdf>

36. These broad principles can be tailored by individual companies and provide a lens to developing, measuring and enhancing gender equity and diversity in a firm's workplace. They are not one-size fits all reporting regime, but are broad principles so that the specific needs and circumstances of employees and the business are taken into account.

Detailed Examination of the Bill

37. ACCI believes that the following provisions requires further clarity and in some cases amendment, prior to the Bill progressing before the Parliament:
- a. It is not clear what will be the purpose of the existing "*employment matters*" listed in s.3 of the Act. They do not seem to be linked to the gender equality indicators, nor to minimum standards in any direct manner;
 - b. There is no definition of "*remuneration*" in the Bill;
 - c. Regarding the proposed s.3 "*gender equality indicators*":
 - i. The reference to "*workforce*" is not limited to employees and could include volunteers, independent contractors, and volunteer office holders;
 - ii. Is the reference to "*equal remuneration between women and men*" under proposed s.3 amendments, intended to be the same meaning as equal remuneration for work of equal or comparable value under the *Fair Work Act 2009*? Moreover, this appears not to be limited to employees only;
 - iii. What is meant by "*utility of employment terms ...*" under proposed s.3 amendments?;
 - iv. What is meant by "*consultation with employees on issues concerning gender equality in the workplace*" under proposed s.3 amendments;
 - d. Under the definition of "*relevant employer*" in s.3 and the reference to "employees in Australia", are employees who are temporarily working outside of Australia included in the count? What happens in the case of a merger or acquisition, where the number of employees in one report could be vastly different?

How will the minimum standard apply in those circumstances?
How will the minimum standard for an “industry” (which isn’t defined) apply when the business cannot be easily categories in an industry and/or has multiple different business operations in various industry sectors (or sub-sectors) or the industry changes as a result of a merger or acquisition?

- e. Proposed s.10(1)(aa) does not make clear what are the “*benchmarks*” that could be made in relation to gender equality indicators;
- f. Under proposed s.16(1)(b) it is not clear what “*members*” an employer must inform;
- g. Under proposed s.16A and 16B an employer must take all reasonable steps to inform each employee organisation that has members who are employees of the employer. The employer must advise employee organisations that comments on the report may be given to the employer or to the Agency. An employer does not ordinarily know, nor do they ask employees, whether they are a union member and which union they belong to. Where a union or multiple unions are not active in a workplace, it makes no sense to require an employer to provide a report to those unions when their presence is not known. Requiring the employer to advise unions is also problematic when it involves multiple unions or when the union is not known. Moreover, what is the employer to do with those comments it has received? The risk is that this could result in an unnecessary disputation within the workplace where a union wishes to become involved in the verification of the report. It is open for employees to inform their union and for either the employee or union to provide feedback to Agency if there is a concern about the veracity of the information provided;
- h. The concept of minimum standards in proposed s.19 is not supported. Moreover, it allows for discrimination if the minimum standards apply to particular employers. If minimum standards are to apply they should be established prior to the Bill progressing through the Parliament. Only when minimum standards are known can any objective assessment as to the impact of the proposals will be able to be conducted;
- i. Proposed s.16B indicates that if any information is “false” or “misleading” this can result in non-compliance under proposed

- s.16D. This appears to be a harsh and significant requirement as it does not allow for cases of genuine mistakes in providing detailed information to the Agency. It is usually the case that employment data involving hundreds or thousands of employees will invariably not be correct 100% of the time, yet the employer may be named and shamed and locked out of procurement on account of unintentional errors, usually caused by an administrative error in payroll or HR systems;
- j. Proposed s.19C is unclear in that it may involve subjective assessment by the Agency who will determine whether “performance against the base standard has failed to improve”. It is unclear what this failure to improve will be and is impossible to assess the impact on reporting firms;
- k. Proposed s.19(2) mandates the Agency in the case of non-compliance to name the employer in a report and “*set out details of the non-compliance*”. This could be potentially harmful for the employer, depending on what indicators are prescribed by the relevant Minister. The employer’s reasons for non-compliance is not able to be published in the Agency’s report. There should be a reconsideration of requiring details of non-compliance. Once again, there is no encouragement for firms to participate, when they potentially expose themselves to negative public commentary and can chose to not participate at all;
- l. There are tensions in the policy objectives within the Bill and between existing laws on industrial relations and anti-discrimination. For example, in *Australian Iron & Steel Pty Ltd v Banovic* (1989) 168 CLR 165, the High Court held an employer discriminated on the grounds of sex under the NSW discrimination legislation in applying the “last on first off” principle in redundancy situation. This was due to the fact that female employees were disproportionately represented in the ranks of recent recruits, which was the result of the positive attempts by the employer to recruit females in order to counteract past discrimination. There are many double jeopardy situations as a result of the application of discrimination and industrial laws which protect individuals (employees and job seekers) against adverse action based on protected attributes (ie. sex). If there are minimum standards which mandate the preference of recruiting one gender over the other (this could be females in the case of a predominantly

male workforce and vice-versa, in an industry sector) this could expose an employer who is trying to comply with the new minimum standards to legal action under discrimination and industrial relations laws, if they attempt to alter their recruitment arrangements and give preference over one sex to meet minimum standards. Given the alternative, the firm may chose to be non-compliant under the Act. This is an invidious position for the employer to be in.

- m. It is unclear how s.4 of the Act which states that "*[n]othing in this Act shall be taken to require a relevant employer to take any action incompatible with the principle that employment matters should be dealt with on the basis of merit*" reconciles with the proposed minimum standards. If an employer states that it has recruited persons on the basis of merit and not gender, and this is a reason for technical non-compliance, will an employer still be "named and shamed" and locked out of procurement?
- n. There are no statutory appeal rights for aggrieved employers, who wish to challenge a determination of the WGEA. Despite no pecuniary penalties applying for non-compliance, the penalty of having a firm's brand and reputation tarnished by naming and shaming or locked out of procurement based on an erroneous finding of non-compliance is significant. There should be both an internal and external appeal mechanism to challenge decisions or findings of non-compliance (which is governed by ordinary principles of administrative law).
- o. The Committee should be satisfied that that reliance of the External Affairs power of the Constitution enables the Commonwealth to create a series of benchmarks, reporting obligations and minimum standards based on, *inter alia*, the conventions listed in proposed s.5(9).

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MECHANICAL CONTRACTORS'
ASSOCIATION**

30 CROMWELL STREET
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CONSULT AUSTRALIA

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SYDNEY NSW 2000

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E: acea@acea.com.au
W: www.consultaustralia.com.au

**LIVE PERFORMANCE
AUSTRALIA**

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MELBOURNE VIC 3000

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F: 03 9614 1166
E: info@liveperformance.com.au
W: www.liveperformance.com.au

**AUSTRALIAN INTERNATIONAL
AIRLINES OPERATIONS GROUP**

C/- QANTAS AIRWAYS
QANTAS CENTRE
QCD1, 203 COWARD STREET
MASCOT NSW 2020

T: 02 9691 3636
F: 02 9691 2065

**AUSTRALIAN MADE, AUSTRALIAN
GROWN CAMPAIGN**

SUITE 105, 161 PARK STREET
SOUTH MELBOURNE VIC 3205

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E: ausmade@australianmade.com.au
W: www.australianmade.com.au

**NATIONAL BAKING INDUSTRY
ASSOCIATION**

BREAD HOUSE, 49 GREGORY TERRACE
SPRING HILL QLD 4000

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E: nbia@nbia.org.au
W: www.nbia.org.au

**NATIONAL ELECTRICAL &
COMMUNICATIONS ASSOCIATION**

LEVEL 4
30 ATCHISON STREET
ST LEONARDS NSW 2065

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**AUSTRALIAN RETAILERS'
ASSOCIATION**

LEVEL 10
136 EXHIBITION STREET
MELBOURNE VIC 3000

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E: info@retail.org.au
W: www.ara.com.au

**BUS INDUSTRY
CONFEDERATION**

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6 LONSDALE STREET
BRADDON ACT 2612

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**OIL INDUSTRY
INDUSTRIAL ASSOCIATION**

C/- SHELL AUSTRALIA
GPO BOX 872K
MELBOURNE VIC 3001

T: 03 9666 5444
F: 03 9666 5008

**PHARMACY GUILD OF
AUSTRALIA**

PO BOX 7036
CANBERRA BC ACT 2610

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F: 02 6270 1800

MASTER BUILDERS AUSTRALIA

LEVEL 1, 16 BENTHAM STREET
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E: enquiries@masterbuilders.com.au
W: www.masterbuilders.com.au

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

525 KING STREET
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E: info@mpmsaa.org.au
W: www.plumber.com.au

**RESTAURANT & CATERING
AUSTRALIA**

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**HOUSING INDUSTRY
ASSOCIATION**

79 CONSTITUTION AVE
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Senate Education, Employment and Workplace Relations
 Legislation Committee Inquiry – Equal Opportunity for Women in the
 Workplace Amendment Bill 2012

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 W:www.neca.asn.au

**NATIONAL FIRE INDUSTRY
 ASSOCIATION**

PO BOX 6825
 ST KILDA CENTRAL VIC 8008

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 F: 03 9865 8615
 W:www.nfia.com.au

NATIONAL RETAIL ASSOCIATION

PO BOX 91
 FORTITUDE VALLEY QLD 4006

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 E:info@nationalretailassociation.com.au
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AUSTRALIAN HOTELS ASSOCIATION

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 BARTON ACT 2600

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 E: aha@aha.org.au
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**PLASTICS & CHEMICALS
 INDUSTRIES ASSOCIATION**

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 E: info@pacia.org.au
 W:www.pacia.org.au

**PRINTING INDUSTRIES
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 OF AUSTRALIA**

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 AUBURN NSW 2144

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 E: info@printnet.com.au
 W:www.printnet.com.au

W: www.hia.asn.au

**VICTORIAN AUTOMOBILE
 CHAMBER OF COMMERCE**

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**AUSTRALIAN DENTAL
 INDUSTRY ASSOCIATION**

LEVEL 5, 757 ELIZABETH STREET
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