

Submission

to

House of Representatives Standing Committee on
Employment, Workplace Relations and Workforce Participation

Inquiry into workforce challenges in the Australian tourism sector

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SUBMISSION OF THE LIQUOR, HOSPITALITY AND MISCELLANEOUS UNION

TO THE 2006 INQUIRY INTO

WORKFORCE CHALLENGES

IN THE AUSTRALIAN TOURISM SECTOR

The Liquor, Hospitality and Miscellaneous Union (LHMU) welcomes the opportunity to make a submission to the House of Representatives Standing Committee on Employment, Workplace Relations and Workforce Participation's current inquiry into workforce challenges in the tourism industry in Australia. We note that the Committee is to give particular attention to current and future employment trends, and possible measures to deal with perceived difficulties in the sector.

This submission will address the issues identified by the Committee's terms of reference as requiring "special attention".

Part 1: About the LHMU and the tourism sector

The LHMU is a diverse union with membership across a range of service and manufacturing industries.

The LHMU is the product of the amalgamation in the early 1990s of the Federated Liquor and Allied Industries Employees Association and the Federated Miscellaneous Workers Union.

At June 30, 2006 the LHMU had more than 30,000 members employed in the tourism sector – that is, members employed in or in connection with tourism-related industries including

accommodation, restaurants, catering, casinos, pubs and clubs, which we refer to collectively as the hospitality industry.

The LHMU has worked extensively on behalf of these members and their colleagues in the hospitality industry. It established and has maintained safety net awards in federal and State industrial systems and where possible, it has assisted members in enterprise bargaining for agreements that improve on the minimum wages and conditions provided for in awards.

Before its powers were heavily circumscribed by the Howard Government as part of its employer-driven *WorkChoices* agenda, the Australian Industrial Relations Commission (AIRC) had an important role in relation to hospitality workers. The AIRC recognized in a number of significant decisions that there was little enterprise bargaining in the hospitality industry and that, as a consequence, the vast majority of hospitality workers relied on the award system for their actual rates of pay and conditions.

For example, in the 1997 *Award Simplification Case*¹, for which the *Hospitality Industry – Hotels, Accommodation, Resorts and Gaming – Award 1995* was the vehicle for the application of the Howard Government's first wave of industrial relations reforms passed in 1996, the AIRC heard extensive evidence from employees about the nature of their work and their jobs.

At that time, the AIRC said, the evidence before the Commission showed that:

- 56 per cent of employees in the hospitality were women, with the percentage ranging from 67 per cent to 82 per cent in semi-skilled and unskilled classifications;
- 47 per cent of employees were casuals, by far the largest proportion in any industry, and only one-third of the work force worked 35 hours a week or more; and
- 40 per cent of employees were aged between 15 and 24 years.

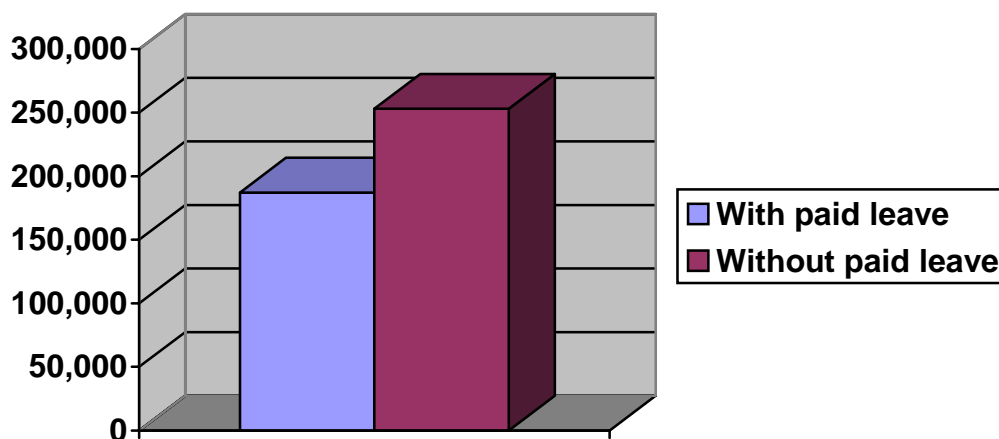
The hospitality industry has become even more casualised since 1997. In our experience, employment in the industry continues to be precarious and employees are constantly concerned that they will not be able to work sufficient hours each week to make ends meet.

¹ (1997) 75 I.R. 272

The ABS Series 6359.0 – *Forms of Employment Australia* analyses the hospitality industry broadly defined – that is, by reference to the “accommodation, cafes and restaurants” sector. The latest report, issued on 19 May 2005, confirms the continued casualisation of the industry.

On the broad industry definition, the industry employed 503, 700 employees aged 15 years and over in November 2004. Of these, more than half were employees without paid leave entitlements. When owner-managers are excluded from the total of employees without leave entitlements, the percentage of employees without leave entitlements increases dramatically, to more than a quarter of a million workers:

Figure 1: Total employment – Accommodation, cafes and restaurants – excluding owners managers



Accommodation Industry – Snapshot at end June 2004

ABS Series 8695.0 – **Accommodation Services Australia** reports the results of the 2003-04 Accommodation survey, thus enabling a more detailed snapshot of the accommodation segment of the broadly defined accommodation, cafes and restaurants sector.

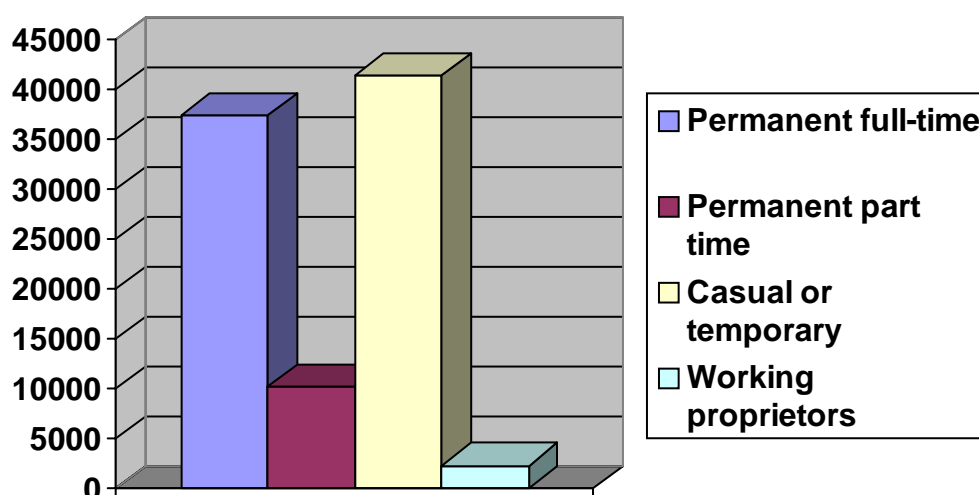
- At the end of June 2004 there were 5 682 accommodation businesses operating in Australia, employing 91,399 persons in 6 372 accommodation locations around Australia.
- The major accommodation types were motels (37.6 per cent of all locations), caravan parks (19.7 per cent), serviced apartments (9.1 per cent) and licensed hotels (8.4 per cent).

- Of the 91,399 employed persons, 41,433 (or 45.3 per cent) were employed on a casual or temporary basis. Permanent full-time employees accounted for 41 per cent (37,439 persons) while permanent part-time employees accounted for 11.2 per cent (10,239 persons).

Table 1: Composition of the Accommodation industry workforce

Permanent full-time	37439
Permanent part time	10239
Casual or temporary	41433
Working proprietors	2289

Figure 2: Composition of the Accommodation industry workforce

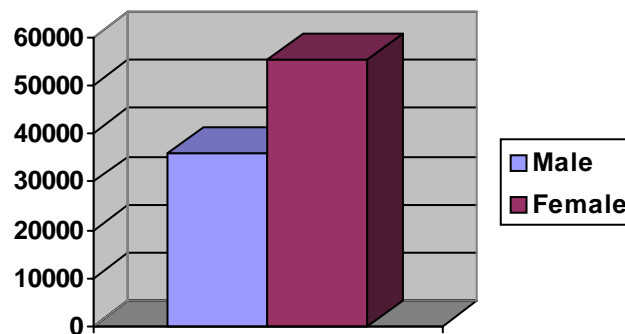


- Females dominated the accommodation services workforce, accounting for 60.7 per cent (55,441 persons) of all employment:

Table 2: Gender distribution, accommodation industry workforce

Male	35958
Female	55441

Figure 3: Gender distribution, accommodation industry workforce



- Females were more likely to be employed in casual positions, accounting for 53 percent (29 405 persons) of all female employment.

Part 2: The Award system

The vast majority of hospitality workers in Australia continue to rely on the Award system for their wages and working conditions, and until 2006, relied on the ACTU and the LHMU to argue for and secure these improvements. Many thousands of workers who were not LHMU members benefited from our work.

The ACTU has established² that, prior to the introduction of the *Workchoices* amendments, there were approximately 1.6 million minimum wage workers covered by State and Federal awards, concentrated in three sectors:

- Retail trade;
- Accommodation, cafes and restaurants, and
- Health and community services.

The highest concentration of minimum wage employees is found in the retail industry, closely followed by the accommodation, cafes and restaurants industry. These industries also have the highest density of minimum wage earners.

² In its July, 2006 submission to the Australian Fair Pay Commission: at pages 25-27:

www.fairpay.gov.au/fairpay/Submissions/Organisations/employee

The ACTU supplied the Fair Pay Commission with unpublished Australian Bureau of Statistics data³ establishing that average weekly total earnings for all employees was the lowest in the retail trade and accommodation, cafes and restaurants industries:

Table 3: Minimum Wage Workers by Industry⁴

Industry	Density %	Concentration %
Mining	*1.8	0.1
Manufacturing	15.5	8.5
Electricity, Gas and Water Supply	*1.7	0.1
Construction	15.8	4.2
Retail Trade	31.5	22.6
Accommodation, Cafes and Restaurants	60.2	17.0
Transport and Storage	14.4	2.7
Communication Services	*2.1	0.1
Finance and Insurance	4.7	1.0
Property and Business Services	18.9	13.7
Government Administration and Defence	*0.7	0.2
Education	8.5	4.1
Health and Community Services	27.2	15.5
Cultural and Recreational Services	16.4	2.0
Personal and other services	23.6	4.5
Total	19.9	100.0

In relation to these figures, the ACTU submitted⁵:

By way of explanation; the above Table shows that: 60% of all workers in the accommodation, cafes and restaurants industry are paid the minimum award rate ie: not paid under an agreement or other contract, this 60% make up 17% of all workers who are paid solely under an award.

The ACTU pointed out that the table indicated that minimum wage earners were most heavily concentrated in the retail trade (22.6 per cent) and in accommodation, cafes and restaurants (17.0 per cent).

The profile of the hospitality industry is in conformity with ABS unpublished data (included in the ACTU submission to the AFPC⁶) which demonstrates that minimum wage workers were more

³ ABS Survey of Employee Earnings and Hours (Cat. No. 6305.0) May 2004

⁴ Source: ABS Cat No. 6305.0 Employee Earnings and Hours Unpublished

⁵ at p.26

⁶ at p. 31, at Table 4.9; Source: ABS Cat No. 6305.0 Unpublished

likely to be women and working part-time and more than twice as likely to be employed on a casual or casual part-time basis:

Table 4: Characteristics of Minimum Wage Workers and All Employees

Characteristics	Award Only	All Employees
Female	60.3	48.9
Junior	15.6	6.2
Part-time	59.0	34.2
Casual	46.5	20.9
Casual and Part-time	42.4	17.8

Part 3: The current wage freeze

Since the proclamation in March 2006 of the *WorkChoices* amendments, which stripped the AIRC of its minimum wage fixing powers, the vast majority of award-only workers in the hospitality industry have been subjected to a wage freeze. Their wages will now be subject to decisions of the so-called Australian Fair Pay Commission. The first such decision is not expected until at least November 2006 – some six months after Federal award-based workers could reasonably have anticipated an AIRC increase from the annual Safety Net Review process.

Already low-paid, these workers are experiencing a wage freeze at a time of rising mortgage rates, rising employer profits, and rising petrol and food prices.

A significant reason they are in low-wage work is that from 1997, the AIRC was constrained by the *Workplace Relations Act 1996* to provide only for minimum wages in its awards. Awards which contained rates higher than properly fixed minimum rates (including some in the hospitality industry) had the wage rates disaggregated and the above-minimum component expressed as a residual payment, to be absorbed over time until eliminated.

For most employers in the hospitality industry, these new minimum rates became actual rates. Most hospitality employers chose not to bargain⁷ – the *Workplace Relations Act* imposed no obligation on them to bargain with their employees, and restricted the opportunities of employees to force them to bargain in good faith.

⁷ This is acknowledged by the 8000-member Australian Hotels Association, which describes itself as “the pre-eminent tourism and hospitality industry organisation in Australia”. In its submission to the Australian Fair Pay Commission, the AHA said (at page 2): “Our members operate under three federal awards and numerous State awards (now NAPSA’s). Currently less than 10 % of AHA members operate under workplace agreements”.

There has been no discernible increase in the level of enterprise bargaining in recent years. Where “bargaining” did occur in the 1997-2005 period, it was often driven by freelance bargaining agents - engaged by employers for the purpose - who manipulated the “no disadvantage test” to drive real wages below the so-called properly fixed minima and to lock low wage rates into Section 170LK non-union agreements.

Now the *WorkChoices* amendments have tilted the workplace balance of power further in favour of hospitality employers:

- With the abolition of the “no disadvantage test”, the limited protection it afforded hospitality employees has also gone.
- Further restrictions have been placed on the rights of hospitality and other workers to organize and to take industrial action in favour of better wages and conditions.
- The removal of the right of a majority of hospitality industry employees to access unfair dismissal processes will further threaten their job security.

There can be no doubt that low wages mean that the tourism-related industries are employers of last resort (or second last resort, if the even lower wages in the retail industry are taken into account) for many workers.

Part 4: Specific issues for the Inquiry

This section of the LHMU submission will address the issues the Committee has been asked to give particular reference to, that is:

- Current and future employment trends in the industry;
- Current and emerging skill shortages and appropriate recruitment, coordinated training and retention strategies;
- Labour shortages and strategies to meet seasonal fluctuations in workforce demands;
- Strategies to ensure employment in regional and remote areas; and
- Innovative workplace measures to support further employment opportunities and business growth in the tourism sector

The most significant issue affecting current and future employment trends in the tourism industry is the high incidence of precarious, casual jobs – reflected in Figures 1 and 2 above.

For most workers, tourism-related work is seen as low-paid, transient and temporary work. The industry is not seen as a long-term career option.

The preponderance of low-paid, insecure, part-time and casual jobs in the tourism-related industry is likely to continue. This likelihood can be traced to the 27 March, 2006 *WorkChoices* amendments to the *Workplace Relations Act* – particularly in relation to Award rights, but also in relation to unfair dismissal rights.

1. Wages: The latest ABS *Labour Price Index*⁸ series, issued on 16 August 2006 and applicable to the June quarter, 2006, showed the “accommodation, cafes and restaurant” sector recording the lowest quarterly and the lowest annual increase in total hourly rates of pay both in original terms, and in seasonally adjusted terms.

The Australian Hotels Association was frank about the reasons for this in its written submission to the Australian Fair Pay Commission:

Currently less than 10% of AHA members operate under workplace agreements ... Employees in the accommodation, café and restaurant industry are three times more likely (60.2%) to be award only employees than other industries (19.9 %). This means that an adjustment in minimum wages affects the industry more than those that are less reliant on the award system.

The AHA went on to doubt there would, in the immediate future, be “significant opportunities to cut real wages”, and suggested that “the bargaining position of individual workers will remain strong”.

In view of the fact that the Consumer Price Index (weighted average all capital cities) increased by 4 per cent⁹ in the year ending 30 June 2006, the 3.3 per cent increase in the *Labour Price Index* for the same period for the sector represents an opportunity already taken “to cut real wages”. There is

⁸ ABS *Labour Price Index Australia* (June quarter 2006) Cat. No. 6345.0

⁹ *Consumer Prince Index*, June Quarter 2006, Cat. No. 6401.0

no evidence on these figures that the “bargaining position of individual workers” in the sector is or will become strong or even stronger. But there is evidence of strong profitability in the sector¹⁰.

Ironically, the AHA sought in its AFPC submission to portray its minimalist wage strategy as a virtue: arguing that any increase in minimum wages “should be introduced prospectively” because “any adjustment to minimum wages affects the industry more than those (industries) that are less reliant upon the award system”. The AHA sought “a minimum three month period” from the date of any AFPC determination before any increase was payable by employers. The effect of this proposal would be to extend the current wage freeze by a further three months, making 21 months in total since the bulk of workers – workers whom the AHA acknowledges are award-reliant - in the accommodation, cafes and restaurants sector and other tourism-related enterprises last received a wage increase.

The LHMU believes the industry’s minimum wage/ maximum profit strategy is the source of its current chronically high turnover of labour, as is its culture against investment in skills training. Until the issue of low wages is addressed by employers and industry leaders the industry will continue to struggle.

2. Casualisation: An important right for casual employees in the hospitality industry – the right to seek permanent employment after working for the same employer on a regular and systematic basis for 12 months or more – has been declared by the Parliament to be no longer an “allowable award matter” and the right is no longer enforceable by a qualifying employee.

In April 2003, following conciliation assistance from the AIRC, the LHMU and the Australian Hotels Association reached agreement to vary the *Hospitality Industry – Hotels, Accommodation, Resorts and Gaming Award* to give qualifying casual employees the right to convert their status to “permanent” full-time or part time employment. The award variation provided that hospitality employees who had worked on a regular or systematic basis for several period of employment or for an on-going period of employment for at least 12 months qualified for the right to elect to become

¹⁰ See, for example: ABS News Release of 4 July 2006, which reported Australia’s pubs, taverns, bars and hospitality clubs generated over \$18 billion in income during 2004-2005, of which \$11 billion was generated by pubs, taverns and bars. Gambling contributed 24 per cent of the \$11 billion, and pubs, taverns and bars generated operating profit before tax of \$784 million – a profit margin of 7.1 per cent. [See [Attachment A](#) to these submissions].

permanent employees. The agreement did not make it compulsory for long-term casuals to convert to full-time or part-time status, nor did it permit employers to compel casuals to convert their status.

It provided a process for those who wanted more secure employment. The process was subsequently inserted – mainly by consent – in similar terms in other Federal and State awards covering hospitality workers

In dealing with a request for conversion, an employer was obliged to act reasonably. The employer could refuse a request on a number of grounds – such as the size and needs of the enterprise, the nature of the work, the trading patterns of the enterprise, and the qualifications, skills and training of the employee. But where an employer rejected a request and the employee thought the rejection was unreasonable, the employee was able to refer the refusal to the AIRC for decision.

The agreed process provided more secure employment for many long term casuals who sought it, but the right for employees to make the request and to have a rejection scrutinised for fairness has been taken away by section 515(1)(b) of the *Workplace Relations Act*, which declares “conversion from casual employment to another type of employment” to be not allowable as an award matter.

The LHMU believes there was no logical reason for Parliament to remove this incentive on employers in the tourism industry to offer job security and career prospects for employees. The clause led to permanency for some employees in the industry, generally by direct negotiation. The LHMU represented members in negotiations in a number of States, and very few disputes needed to be referred to the AIRC for resolution.

The LHMU believes the Committee should consider recommending the repeal of section 515(1)(b) of the *Workplace Relations Act*. It serves no purpose to outlaw a mechanism for encouraging better-paid and more secure jobs in tourism and related industries through de-casualisation of the industry. The process involved in the now defunct award clause was balanced and provided for the AIRC to assist in appropriate cases. The LHMU is not aware of any complaint that the process was onerous, or was misused.

A further irony arising from the heavy casualisation of work in the tourism-related sector reflected in **Figure 2** above is that more than half of the workers in the sector do not have access to the paid leave that is utilised in filling the hotel and motel beds and consuming the associated food, beverage

and gambling services that the sector provides. The AHA issued a media release¹¹ on 3 May 2006 urging Australians “to heed the call for them to use up more of their accrued annual leave to boost tourism”. The release was in response to a Tourism Australia study estimating that Australians now have some 70 million days of annual leave stockpiled. The AHA membership has a casualised employment culture which denies paid annual leave to the majority of their employees, but has no qualms in seeking profit from the employees of employers that extend such benefits.

The AHA welcomed¹² *Work Choices*, apparently failing to notice that one of its provisions¹³ enabled employers to prevail on their employees to forego up to two weeks of their leave in exchange for cash. This provision is not tourism-friendly and should be repealed.

3. Job Security: Along with all other Australians who are employed by corporations with fewer than 100 employees, many thousands of workers in tourism-related industries have lost access to review of unfair dismissals. This is because the majority of employers in the industry employ fewer than 10 employees, and only a relative handful employ more than 100. ABS figures applicable to the Accommodation industry are illustrative of the point. The majority of accommodation businesses (74.3 per cent or 4219) employ fewer than 10 persons. Only 139 businesses¹⁴ (or 2.5 per cent) employ 100 or more employees.

Table 5: Accommodation businesses - employment

Employees	Businesses	Employment
0 – 4 persons	2466	6410
5 – 9 persons	1753	10950
10 – 19 persons	627	8075
20 - 49 persons	533	14817
50 – 99 persons	165	11028
100 or more	139	40119
Total	5682	91399

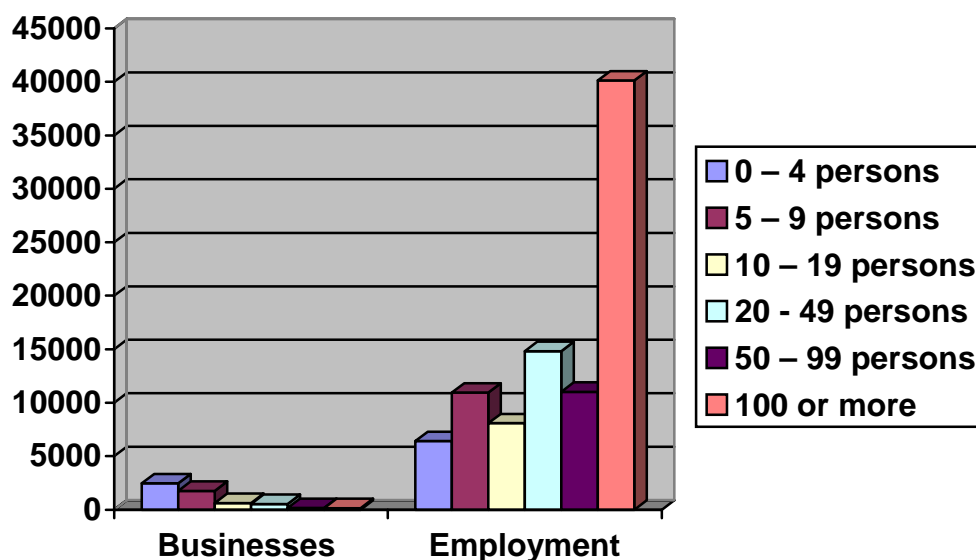
¹¹ Media Release: *Hotels Join Call for Australians to Take a Break* (3 May 2006): www.aha.org.au/media020506

¹² Media Release, *Hotels Welcome Workplace Reforms* (27 May 2005) : www.aha.org.au/media270505

¹³ See section 233 of the *Workplace Relations Act*.

¹⁴ And these businesses are able to avoid AIRC scrutiny of unfair dismissal practices if they can construct “operational reasons” to justify their position.

Figure 4: Accommodation businesses - employment



Thus the Government's decision to exempt businesses employing 100 or fewer employees from unfair dismissal laws excluded a total of 5544 business (97.5 per cent) and 51 280 employees (56.1 per cent) from access to the protections of an International Labor Organisation Convention to which Australia remains a party.

The LHMU believes the Committee should consider recommending the removal of the 100-employee threshold for access to the unfair dismissal jurisdiction of the *Workplace Relations Act*. In tourism and related industries, the threshold is a loud and clear signal to prospective employees that in respect of 97.5 per cent of potential employers in the industry, there will be no job security. Workers who value job security will look elsewhere for a career unless and until this is done.

4. Skill shortages and itinerants: There is widespread anecdotal support for the view that many employers in tourism related industries pay cash in hand to itinerant and "backpacker" staff, partly to avoid on-costs such as occupational superannuation levies, but also to avoid facing the fundamental need to invest skills training to lock in long-term, career-oriented employees. For too long the employers in this industry sector have relied on others to pay for the training – anecdotally, the main reason is that they fear other employers will gain the benefit of their expenditure if the trainee moved on.

The LHMU believes the industry's reluctance to spend on training was a motivating force behind its successfully lobbying effort in relation to the Working Holiday Maker scheme. Under changes announced by the Government in May 2006, the scheme was adjusted to allow backpackers and other itinerant foreign holiday makers to work in a particular job in Australia for six months, rather than three months. The Tourism and Transport Forum welcomed this change, suggesting it would "help address the major skills and labour shortfall in Australia's tourism industry", and encourage employers in the tourism industry to hire working holiday makers¹⁵.

In the same media release, TTF acknowledged the tourism industry was having difficulty filling vacant positions, and identified shortages of food and beverage staff, kitchen hands and supervisors, as well as chefs, maintenance workers, clerks, front of house staff and general staff with strong customer service skills. TTF suggested the shortages had come about "due to the strong growth in the tourism industry over the last twenty years and the current labour market conditions".

The LHMU suggests the shortages have come about because of a lack of investment in training and a low-wage culture among employers that makes the jobs they offer very unattractive. The *Labour Price Index* figures do not show a market-driven increase in wages reflecting the shortage of labour in the sector referred to by TTF. Rather they show that for every \$4 increase in wages in industry generally, the accommodation, cafes and restaurants sector pay only \$3 extra.

The ability of the sector's employers to access backpackers and other imported labour through schemes such as the extended Working Holiday Maker Scheme and the "Section 457 visa" scheme are rewarding an industry that has demonstrably failed to invest in the skills needed to meet anticipated demand. The tourism sector is one of the most subsidized, analyzed and "forecast" industries in Australia and it is not credible to argue that "current labour market conditions" in the sector were not foreseeable.

Part 5: Conclusion

The Committee needs to think through the impact *Work Choices* will have on the capacity of Australians (including employees in tourism and related industries) to accrue and enjoy leisure time, and thus their capacity to consume local and regional tourism products.

¹⁵ TTF Australia, Media Release, *Visa Announcement a Win for the Tourism Industry* (3 May 2006).

The Committee also needs to think through the impact low wages have on tourism and related industries, the lack of investment in skills acquisition for employees in the industries, and the lack of secure, long-term employment opportunities that flow from the culture of casualisation of employment in the industries.

The Committee should add its voice to those who see the preponderance of low-paid, insecure jobs as a fundamental barrier to the development of a vibrant, cost-efficient tourism industry. It should encourage the diversion of some of the hefty profits generated by important sectors of the industry into training and into making the industry an employment area of choice, rather than as a source of temporary jobs for workers looking for a real job, backpackers and temporary visa holders.

ATTACHMENT A

Extracted from: March quarter 2006: Employment in Tourism Accommodation (Australia)¹⁶

a) Hotels, Motels and Serviced Apartments

	Establishments¹⁷	Persons employed¹⁸	Employees/estab.
5- 14 rooms	1, 983	12, 279	6.19
15 or more rooms	4, 187	114, 042	27.24
Total 5 or more rooms	6170	126,321	20.47

b) Total persons employed - Hotels, Motels and Serviced Apartments (5 or more rooms) (Australia).

	Establishments	Persons employed	Employees/estab.
New South Wales	2047	36719	17.94
Victoria	1261	24561	19.48
Queensland	1518	33739	22.23
South Australia	412	8974	21.78
Western Australia	482	11230	23.30
Tasmania	283	5551	19.61
A.C.T.	107	N/a	N/a
Northern Territory	60	N/a	N/a
TOTAL	6170	126321	20.47

¹⁶ ABS – Tourist Accommodation – 8635.0 (March 2006), p. 10

¹⁷ Defined as “the number of licensed hotels and resorts, motels and guest houses, serviced apartments, caravan parks and visitor hostels within the scope of the survey which operated for any part of the survey period, or which closed temporarily for the quarter for seasonal reasons”: 8635.0, p.61

¹⁸ Defined as “the total number of persons working at each accommodation establishment at the end of the survey period (including working proprietors and those working on other than accommodation activities). This data item is not applicable to holiday flats, units and houses let by real estate agents”: 8635.0, p. 62.

Employment¹⁹ in Pubs, Taverns and Bars, Australia 2004-2005²⁰: June quarter 2005

	With gaming	Without gaming	Total
Premises			
Capital cities	1505	603	2108
Other	1600	544	2144
	3105	1147	4252
Employment			
Gaming staff	21924		21924
Other	42980	16770	59750
	64905	16770	81675
Income \$m	9565	1549	11114
Expenses \$m	8901	1468	10369
Operating profit before tax \$m	701.7	82.5	784.2
Operating profit margin	7.4%	5.4%	7.1%
Labour costs \$m			
Wages and salaries	1627.8	331.3	1959.2
Employer contr. to super funds	152.3	29.3	181.6
Other	111.2	15.9	127.2
Total	1891.4	376.6	2268.0
Proportion of total expenses	21.2%	25.7%	21.9%

	Businesses		Total persons employed		Employees/ Business	
	With gaming	Without gaming	With gaming	Without gaming	With gaming	Without gaming
New South Wales	1097	51	20991	1094	19.1	21.5
Victoria	348	518	13162	6649	37.8	12.8
Queensland	387	163	14268	2447	36.9	15.0
South Australia	331	69	10362	752	31.3	10.9
Western Australia	138	190	3413	4280	24.7	22.5
Tasmania	86	60	2295	813	26.7	13.6
A.C.T.	7	26	120	340	17.1	13.1
Northern Territory	12	18	294	396	24.5	22.0
TOTAL	2362	1092	64905	16770	27.5	15.4
	3454		81675		23.6	

¹⁹ Excludes "businesses mainly engaged in the provision of accommodation, retailing alcoholic beverages for consumption only off the premises, or organisations mainly engaged in operating licensed clubs".

²⁰ (ABS, 8687.0; 4 July 2006).

