ACCI Submission to Senate Standing Committee on Economics

Inquiry into CPRS Draft Legislation

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ABN 85 008 391 795

Canberra Office

24 Brisbane Avenue
BARTON ACT 2600

PO Box 6005
KINGSTON ACT 2604

Telephone: (02) 6273 2311
Facsimile: (02) 6273 3286
Email: info@acci.asn.au

Melbourne Office

Level 3
486 Albert Street
EAST MELBOURNE VIC 3002

PO Box 18008
Collins Street East
MELBOURNE VIC 8003

Telephone: (03) 9668 9950
Facsimile: (03) 9668 9958
Email: melb@acci.asn.au

Web: www.acci.asn.au

1. ACCI LEADING AUSTRALIAN BUSINESS

ACCI has been the peak council of Australian business associations for 105 years and traces its heritage back to Australia's first chamber of commerce in 1826.

Our motto is "Leading Australian Business."

We are also the ongoing amalgamation of the nation's leading federal business organisations - Australian Chamber of Commerce, the Associated Chamber of Manufactures of Australia, the Australian Council of Employers Federations and the Confederation of Australian Industry.

Membership of ACCI is made up of the State and Territory Chambers of Commerce and Industry together with the major national industry associations.

Through our membership, ACCI represents over 350,000 businesses nation-wide, including over 280,000 enterprises employing less than 20 people, over 55,000 enterprises employing between 20-100 people and the top 100 companies.

Our employer network employs over 4 million people which makes ACCI the largest and most representative business organisation in Australia.

1.1. Our Activities

ACCI takes a leading role in representing the views of Australian business to Government.

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, committees and other fora.
- Representing business in national and international fora including the Australian Fair Pay Commission, Australian Industrial Relations Commission, Australian Safety and Compensation Council, International Labour Organisation, International Organisation of Employers, International Chamber of Commerce, the Business and Industry Advisory Committee to the Organisation for Economic Co-operation and Development, the Confederation of Asia-Pacific Chambers of Commerce and Industry and the Confederation of Asia-Pacific Employers.
- Research and policy development on issues concerning Australian business.
- The publication of leading business surveys and other information products.
- Providing forums for collective discussion amongst businesses on matters of law and policy affecting commerce and industry.

1.2. Publications

A range of publications are available from ACCI, with details of our activities and policies including:

- The ACCI Policy Review; a analysis of major policy issues affecting the Australian economy and business.
- Issue papers commenting on business' views of contemporary policy issues.
- Policies of the Australian Chamber of Commerce and Industry – the annual bound compendium of ACCI's policy platforms.
- The Westpac-ACCI Survey of Industrial Trends - the longest, continuous running private sector survey in Australia. A leading barometer of economic activity and the most important survey of manufacturing industry in Australia.
- The ACCI Survey of Investor Confidence – which gives an analysis of the direction of investment by business in Australia.
- The Commonwealth-ACCI Business Expectations Survey - which aggregates individual surveys by ACCI member organisations and covers firms of all sizes in all States and Territories.
- The ACCI Small Business Survey – which is a survey of small business derived from the Business Expectations Survey data.
- Workplace relations reports and discussion papers, including the ACCI Modern Workplace: Modern Future 2002-2010 Policy Blueprint and the Functioning Federalism and the Case for a National Workplace Relations System and The Economic Case for Workplace Relations Reform Position Papers.
- Occupational health and safety guides and updates, including the National OHS Strategy and the Modern Workplace: Safer Workplace Policy Blueprint.
- Trade reports and discussion papers including the Riding the Chinese Dragon: Opportunities and Challenges for Australia and the World Position Paper.
- Education and training reports and discussion papers.
- The ACCI Annual Report providing a summary of major activities and achievements for the previous year.
- The ACCI Taxation Reform Blueprint: A Strategy for the Australian Taxation System 2004–2014.
- The ACCI Manufacturing Sector Position Paper: The Future of Australia's Manufacturing Sector: A Blueprint for Success.

Most of this information, as well as ACCI media releases, parliamentary submissions and reports, is available on our website – www.acci.asn.au

2. TABLE OF CONTENTS

3. INTRODUCTION

The Australian Government proposes to soon implement the Carbon Pollution Reduction Scheme (CPRS) - one of the most uncertain and complex economic and social policy agendas to be introduced over recent decades. The CPRS will not only affect those businesses that are liable to acquire permits to emit but also impact other businesses and individuals. These latter businesses are referred to as the 'uncovered' sector. ACCI in general terms supports the move towards the introduction of CPRS as means to reduce Australia's greenhouse gas emissions but expresses concern about many of the elements contained in the CPRS draft legislation as well as the White Paper.

- The introduction and implementation of CPRS will take place in an environment of synchronised global economic slowdown, the magnitude and duration of which remain uncertain. **The global financial crisis has limited business capacity to prepare and operate in a carbon-constrained world and thus ACCI calls for a delay in the implementation of the operational elements of a CPRS in Australia.**

- The CPRS will cause significant structural change to the Australian economy, however it is of concern that the Regulatory Impact Statement as well as the statements detailing the financial impact and the compliance cost impact will only be available when the draft legislation is introduced into the Parliament in May 2009. These missing pieces have limited the ability of the public including ACCI to consider the full costs of the draft legislation especially during the early stages of its implementation.

- ACCI supports the assertion that a very careful balance must be struck between those that receive compensation and those who do not. The overriding principle that a CPRS must be as broad as possible remains key to delivering a low cost abatement CPRS. It is ACCI's view that while the government has listened, and quite appropriately responded, to those sections of the business community directly affected by a CPRS, the detail of concerns expressed by Small and Medium Enterprises (SMEs) has yet to be seriously considered and debated.

- The Treasury modelling indicated an increase of up to 24 per cent for electricity prices and up to 15 per cent increase for gas prices. These increases are in addition to soon to be adopted regulatory increases in prices which may be of similar scale. These increases will have a substantial impact on SMEs especially those that are energy intensive, some of which are also trade exposed and have limited capacity to pass on costs. It is a major flaw in the analysis to date that there is no detailed economic modelling that addresses this impact. ACCI also considers the CPRS will have an even more serious cost impact on SMEs and uncompensated households in regional Australia.

- It is well know that until there is an international agreement on concrete action to address climate change, Australia will not be able to fully implement a CPRS without additional costs to the economy while achieving suboptimal environment outcomes. Thus ACCI encourages the Government to participate and engage in an international climate change agreement that does not compromise Australia's economic position. Australia needs to be cognisant of the recently announced Obama administration's intention to have a cap and trade system operational by 2012, and our response needs to be fully compatible. In this regard, we should not finalise our legislative response until the policy position of the US becomes clearer.

4. General Comments

In September 2008, ACCI provided a submission on the Carbon Pollution Reduction Scheme Green Paper, which outlined the Government's approach to the design of a national emissions trading scheme (ETS). Outlined below is a summary of ACCI's policy position and overall approach on climate change policies and design aspects of the ETS, as developed to date by ACCI Council and our policy committees:

- While an ETS is a market based policy response, ACCI only supports an ETS that is efficient, maximizes participation across all industry sectors and will include major world emitters, wherever possible. A domestic ETS must minimise economic costs and provide measures to ensure the competitiveness of trade exposed energy intensive businesses.

- Setting emissions targets to 2020 should only proceed after thorough cost benefit analysis and considering the full distributional impact across sectors of the economy. Ideally those arrangements applying post 2012 must include commitments from large emitters including India, China and the USA.

- Australia does have the opportunity of developing an effective ETS, yet in the absence of widespread international commitments it must be realistically phased, have achievable targets and feature a well-conceived compensation regime. Without such measures, the adjustment task for Australia will be too severe.

- ACCI considers that Australia's fuel mix can only change over a long period and irrespective of the operation of an ETS. Hence, unrealistic expectations of a shift from fossil fuels to renewables or the adoption of lower emissions technologies need to be tempered.

ACCI is particularly concerned about the combined effect of:

- the significant yet not fully identified economic and transition costs associated with the implementation of a CPRS;

- the substantially reduced capacity of international and domestic economies to withstand the impact of a CPRS at a time of serious financial crisis and a global economic slowdown, the full dimensions of which are yet to be realised or understood;

- the absence to date of firm commitments by most of our major international competitors to the specific introduction of a CPRS in their own jurisdictions; and

- the limits which exist on the availability of low emissions energy options and the limited capacity for Australia to change its energy generating profile over the medium term without substantial economic costs.

5. CRITIQUE ON TREASURY MODELLING

The highly anticipated Treasury modelling on *Australia's Low Pollution Future* released on 30 October 2008 failed to address ACCI's concerns. There are a number of important omissions and caveats in the Treasury modelling:

a. All the policy scenarios assumed that Australia has access to international permits until 2020 and beyond:

   - Perhaps the most important assumption underlying the modelling is that many other large emitters (including China and Russia) begin stringent abatement within the next seven years; developed countries set targets and participate in international emissions trading from 2010; while developing countries gradually join the scheme with complete coverage from 2025; and

   - Australia has access to a significant number of international permits at costs lower than domestic abatement costs.

b. The modelling did not examine the cost if Australia unilaterally implements an emissions trading scheme and international permits were not available before 2020. This is the unconditional commitment stated in the White Paper where Australia will unilaterally commit to reduce emissions to 5 per cent below 2000 levels by 2020;

c. The modelling techniques did not adequately capture structural adjustment effects and thus may underestimate adjustment costs, especially in the short run;

d. The modelling aggregated firms into broad industry categories and thus did not estimate firm-level impacts. Consequently, the modelling:

   - did not attempt to identify the profile or number of firms that may experience severe difficulty in maintaining competitiveness and profitability; and

   - did not assess whether some regions bear a disproportionately higher cost of adjustment, such as those regions with a large proportion of high-emissions intensive industries, or where due to remoteness higher energy costs will have a disproportionate impact.

e. The modelling assumes that technological changes required to operate in a carbon-constrained economy will be available over time. For example, the viability of the coal industry relies heavily on the availability of carbon capture and storage technology in the future; and

f. The assumption of early and coordinated international action implies the modelling did not adequately address the range of risks inherent in a CPRS for emissions-intensive trade exposed industries (EITEs).

The *Review of the Treasury Modelling of the Economics Impacts of Reducing Emissions* prepared by Dr. Brian Fisher from Concept Economics and former ABARE chief for the Senate Select Committee on Fuel and Energy, highlighted the following critical flaws in Treasury modelling:

- Overly optimistic international action assumption together with assumptions on emissions pricing and permit trading bias the results toward low costs of mitigations;

- Competitive impact on EITEs is likely to be felt more strongly in regional and remote Australia, often in locations with limited alternative economy of such high value;

- There is no detailed economic analysis underpinning the designated assistance threshold to the EITEs which seek to ensure the viability and sustainability of Australian industries in a carbon constrained world. Specifically, the exclusion of coal industry from the assistance scheme is inconsistent with the economic case for assistance, which is based on avoidance of adverse effects stemmed from competitiveness and on the efficiency of resources allocation. Moreover, the phase out of the free EITEs permits allocation will cause additional uncertainties;

- According to Concept Economics modelling, the carbon capture and storage (CCS) technology will only be deployed at a carbon price spectrum of \$60 to \$90 per tonne of CO_2-e, and not at a carbon price of \$45 as assumed by the Treasury for coal CCS;

- Treasury assumes there are no barriers to permit trading. However in reality, there are uncertainties relating to whether credits or permits generated in particular countries are verifiable and allow to be imported;

- Treasury assumes a continuation of strong global and domestic growth both during the CPRS implementation phase and in the longer run. However the current global recession has highlighted a sharp discontinuity in economic growth which may take years to return to its trend growth; and

- Treasury modelling does not analyse the unilateral scenario proposed in the White Paper, whereby in the absence of a comprehensive global agreement Australia will undertake unilateral action to attempt to achieve a 5 per cent emissions reductions of 2000 level by 2020.

Therefore, the interaction of the above assumptions is likely to result in the Treasury modelling seriously underestimating the economy-wide and sectoral challenges associated with particular emissions reduction targets, particularly in the short and medium term.

6. Response to Government Preferred Positions

6.1. Commencement of CPRS

While supporting the overall objective of the Government to introduce a CPRS, and acknowledging the Government's election commitment, ACCI is concerned about the commencement date.

The CPRS is due to be implemented in July 2010 with the first auction of permits conducted prior to the start date. However the global financial crisis has negatively affected all facets of the Australian economy including international demand of Australian goods, household consumption, business investment and Australian labour market. It is clear from the December GDP data that Australian non-farm sector has already experienced two consecutive quarters of negative economic growth. Weakness in economic activity as well as dwindling business and consumer confidence has put significant pressure on businesses' profitability. The most recent *ACCI Survey of Investor Confidence* for the March quarter (due to be released on April 7) found that the index of businesses profitability fell to its lowest level since the survey began in 1998 and almost ten points below its five year average.

Moreover, turmoil in the financial markets has resulted in significant credit constraint on Australian businesses. The *ACCI Survey of Investor Confidence* for the March quarter has found that financial constraints have become increasingly prominent as impediments for businesses to invest in plant and equipment. *Raising Loans from Financial Institutions* surged to the seventh highest constraint, the first time it moved into the top ten constraints in more than a decade. This has partly contributed to an increase in the magnitude of both *Insufficient Retained Earnings* and *Current Levels of Debt* as the eight and the ninth most binding constraints on business investments.

The decline in business profitability together with financial constraints have limited the ability of businesses especially SMEs to be prepared to operate in a carbon-constrained world. For instance, SMEs may not be able to invest in changing their existing production equipment or techniques in order to reduce their carbon emissions-intensity per unit of revenue or employee. A recent ACCI survey of businesses across different industry and business size has found that around 48.0 per cent of respondents consider that the CPRS should be delayed until after the economy recovers.

Therefore given current global economic slowdown, the lack of firm global commitments on climate change to date and the costs that may unfairly impose on Australian small and medium sized businesses, the resolution of the December 2008 ACCI General Council meeting called for a delay in the implementation of the operational elements of a CPRS in Australia.

ACCI also considers the Government needs to consider the commencement of the CPRS in the context of actions by industrialised nations, most importantly the US. The recent US draft budget paper for fiscal year 2010 unveiled the Obama administration's intention to implement a cap and trade system to reduce greenhouse gas emissions from 2012.

At this stage we have limited our comments on the detail of the draft legislation until many of the unresolved policy questions are dealt with more fully. However, ACCI does not support ***Part 4, Division 2, Clauses 103 (1) to (4)*** of the CPRS Draft legislation, in which the Minister may determine the policies, procedures and rules that apply in relation to the auctioning of Australian emissions units prior to 1 January 2012. ACCI believes that there should be a clear distinction between ministerial and bureaucratic powers and does not support ministerial decision making in these areas. Thus the CPRS should only be implemented upon the Australian Climate Change Regulatory Authority becoming fully functioning and established.

6.2. Vulnerability of Small and Medium-Sized Businesses

Although SMEs are not directly affected by the CPRS and thus not liable to acquire permits to emit, they are indirectly affected through higher costs for electricity, input materials, transportation etc, as permit costs acquired by larger emitters will be passed through. However to date, ACCI is not aware of any government modelling which looks at the impact of CPRS on SMEs specifically. Without knowing the capacity of SMEs to pass through costs both up and down the supply chain, it is difficult to estimate the final burden on profits and employment.

Firms that are liable to acquire carbon permits to pollute may not ultimately bear most of the costs of the CPRS. Instead where possible they are likely to pass those costs along to their customers (and their customers' customers) in the form of higher prices. By attaching a cost to greenhouse gas emissions, a CPRS would thus lead to price increases for energy and energy intensive goods and services. The higher prices and costs that would result from the CPRS would reduce demand for energy-intensive products as well as the viability of SMEs which relies heavily on energy intensive inputs. Subsequently, workers that are employed by these SMEs could face higher risk of unemployment as SMEs are forced to exit the market.

While the Government has developed a comprehensive assistance package to Emissions Intensive Trade Exposed (EITE) industries, coal-fired electricity generators and middle to low income households, to date no concrete assistance package has been put forward for the SMEs. In the commentary accompanying the CPRS draft legislation, the Government stated that assistance will be provided to the EITE in relation to "the cost increase associated with the use of electricity by an activity, which is assessed as resulting from the introduction of the CPRS" (p.121). However to date the same principle has not been apply to SMEs.

The only assistance to SMEs stated in the White Paper is the $1.37 billion over 5 years provided through the Climate Change Action Fund which includes a Small Business Capital Allowance and the Community Organisation Capital Allowance. The Small Business Capital Allowance will only provide small business applicants with assistance to invest in energy efficient equipment.

Moreover, many small business operators are unaware and ill prepared to adjust their current business practices as well as their production technology. SMEs not captured directly in the CPRS and therefore not responsible for acquitting permits, may not be fully aware of the exposure to a carbon price signal. Therefore, ACCI recommends that before the CPRS is operational information needs to be provided and communicated effectively to small and medium businesses.

The Government should also consider the position of small and medium-sized enterprises that are themselves trade exposed (export and import competing) and their ability to pass on costs to consumers. The introduction of the CPRS in its current form will place a large part of the economic burden on uncompensated businesses, the bulk of which are SMEs, and uncompensated households. In particular the burden will fall hard on those SMEs that are trade exposed, damaging their commercial and operational interests.

ACCI supports the following statements on the ability of SMEs to effectively adjust to a CPRS.

> 'SMEs, although generally not producing the same amount of emissions per company, may have a similar order of magnitude of emissions-intensity per unit of revenue (or employee) if the indirect emissions exposure due to material inputs and transport are considered. Furthermore, as most manufacturing SMEs are placed at the higher valued-added end of the production chain, they stand to be more trade-exposed than the large energy users producing lower-value goods further down the chain (because the ratio of import costs to price of goods decreases as you move up this chain, increasing import susceptibility).
>
> 'SMEs have some unique characteristics which make them particularly exposed to adverse impacts of an ETS and less capable of effectively responding to these impacts. This is because they are:
>
> - Less able to move operations off-shore - due to limited skills, knowledge, financial and human resources compared to larger corporations.
> - Less able to down-size - because of limited staff numbers available for key roles. In such a case the only option may be to close.
> - Less able to assess the impact of an ETS on their business - due to limited technical and scientific capability, human and financial resources.
> - Less able to access appropriate information to determine their emissions-intensity and trade-exposure - because of long up-stream and down-stream external and fragmented supply/production chains. For instance, it is difficult for SMEs business-to-business manufacturers to determine the trade-exposure effect of an ETS on their ultimate consumer market, as this may be several companies removed from them. However, in a large vertically integrated company which deals directly with consumers, or is only one company removed from consumers, this is easier to determine. Longer and more fragmented down-stream external supply chains mean that it is more difficult or impossible to determine the indirect carbon exposure "flow-on" costs from input materials. In the case of a large vertically integrated corporation, the carbon exposure from material inputs are more likely to be known or calculated (from manufacturing processes further back in that company's own production chain).
> - Less confident in speaking up and approaching the Government.
> - Less visible - if SMEs suffer from the impacts of an ETS, this will be less likely to be noticed than if a large company is affected. Because of this, it is particularly important that Government pays attention to the SMEs sector.'[1]

Simple information campaigns while adding to the ability of SMEs to understand the impact of a CPRS will not be enough to secure the future of many. Therefore more analytical work needs to be done by Government on the full economic impact of a CPRS on SMEs and in particular the

[1] Private Submission to the Government's Carbon Pollution Reduction Scheme.

case for compensation arrangements needs to be more fully developed. ACCI urges the Government to pursue this matter with great urgency.

6.3. International Linkages

ACCI supports international linkages but notes it is imperative to get the policy setting right, as a badly linked scheme will have adverse consequences for the design principles of a CPRS. International linking can reduce domestic abatement costs by opening up more opportunities for abatement, which may not be available domestically. It may also enhance price discovery through deeper and more liquid markets providing a closer estimate of an international abatement price.

While ACCI supports Kyoto units and non-Kyoto units to be used for surrender in Australia's CPRS, ACCI is concerned with the monitoring and compliance costs transpired from this linkage.

Moreover, recently released draft US budget paper for the fiscal year 2010 also unveiled the Obama administration's aspiration towards creating a clean energy economy. The draft Budget paper stated that:

- after the enactment of the Budget, the Obama administration will work *expeditiously* with key stakeholders and the US Congress to develop an economy wide emissions reduction programme to reduce GHG emissions approximately 14 per cent below 2005 levels by 2020, and approximately 83 per cent below 2005 levels by 2050;

- the emissions reduction programme will be implemented through a cap and trade system with 100 per cent of auctioning starting in 2012; and

- the ETS will be able to generate USD150 billion over 10 years to fund vital investment in clean energy future. The balance from auction revenue will be returned to the people, especially vulnerable families, communities and businesses to help transition to clean energy.

Thus ACCI urges the Government to participate effectively in an international climate change agreement, especially with the US, and especially where Australia's economic position is not at risk. A unilateral commitment of Australia to reduce greenhouse gas emissions without any international commitment will not only impose additional costs to Australian economy but is also capable only to achieve suboptimal environmental outcomes, in which the costs may outweigh the benefits from the scheme.

6.4. Taxation

Aside from the issue of revenue recycling, the tax treatment of the new financial instruments is critically important in designing an efficient ETS. Other issues, which have not been addressed by the Government policy, include the treatment of emissions permits for the purposes of stamp duty.

An example of how stamp duty might apply is provided below[2]:

- Stamp duty may apply to an emissions trading scheme (ETS) at more than one level. It may apply to the sale and purchase of credits under the scheme, which could be treated as dutiable property, within the terms of the duty legislation. For example, in Queensland, it could be dealt with as a statutory licence, depending on the structure of the ETS, or under an amendment specific to the purpose.

- There may also be duty at a lower level on transactions which are necessary to create carbon credits, or those which relate to afforestation. The connection of that duty to the ETS is less obvious, as transactions could occur for purposes other than compliance.

- At the higher level, if duty were imposed on trading in carbon credits that would essentially increase the price of those carbon credits by the rate of duty.

ACCI is concerned that the State and Territory Governments may impose stamp duties on carbon permits in the first 3 years of the CPRS. The Schedule B of *Intergovernmental Agreement on Federal Financial Relations* recently extended the timetable to abolish state stamp duties on some transactions until 30 June 2013. The intergovernmental agreement stated that:

> "For the avoidance of doubt, the parties confirm that, at the completion of the abolition of all taxes listed in Clause B2 within each jurisdiction, no party to this Agreement will levy stamp duties on the transfer of emissions trading permits." (p. B-2)

This created a potential window of 3 years for states to impose a stamp duty on the purchase and trading of the carbon permits when the CPRS begins in July 2010. Thus ACCI urges the Government to ensure that the states committed to not levy stamp duties on carbon permits during the first 3 years of CPRS as it will undermine the CPRS's objectives and artificially increased the cost of permits.

6.5. Other Issues

Following the implementation of CPRS, ACCI is concerned about the continued implementation of expanded *Renewable Energy Target* (i.e. 20 per cent of electricity supply from renewable sources by 2020). With a CPRS in place, the RET policy only imposes additional costs without any additional abatement. The peer review on Treasury modelling prepared by Concept Economics found that the interaction between CPRS and RET policy will:

- cost Australia $1.8 billion more in 2020 than a pure ETS in terms of gross national product losses;

- cost Australia $1.5 billion more in 2020 than a pure ETS is output (GDP) losses;

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[2] Craig Bowie, 'Should Emission Trading Permit be Exempt from Stamp Duty and Capital Gains Tax?', *Minterellison*, 30 August 2007.

- result in the loss of an additional 3,600 full-time equivalent jobs in 2020; and
- result in electricity prices rising at least 6 per cent more than under ETS alone.

ACCI MEMBERSHIP

CHAMBERS OF COMMERCE & INDUSTRY

ACT and Region Chamber of Commerce & Industry
12A Thesiger Court
DEAKIN ACT 2600
Telephone: 02 6283 5200
Facsimile: 02 6282 5045
Email: chamber@actchamber.com.au
Website: www.actchamber.com.au

Business SA
Enterprise House
136 Greenhill Road
UNLEY SA 5061
Telephone: 08 8300 0000
Facsimile: 08 8300 0001
Email: enquiries@business-sa.com
Website: www.business-sa.com

Chamber of Commerce & Industry Western Australia (Inc)
PO Box 6209
EAST PERTH WA 6892
Telephone: 08 9365 7555
Facsimile: 08 9365 7550
Email: info@cciwa.com
Website: www.cciwa.com

Chamber of Commerce Northern Territory
Confederation House
1/2 Shepherd Street
DARWIN NT 0800
Telephone: 08 8936 3100
Facsimile: 08 8981 1405
Email: darwin@chambernt.com.au
Website: www.chambernt.com.au

Commerce Queensland
Industry House
375 Wickham Terrace
BRISBANE QLD 4000
Telephone: 07 3842 2244
Facsimile: 07 3832 3195
Email: info@commerceqld.com.au
Website: www.commerceqld.com.au

Employers First™
PO Box A233
SYDNEY SOUTH NSW 1235
Telephone: 02 9264 2000
Facsimile: 02 9261 1968
Email: empfirst@employersfirst.org.au
Website: www.employersfirst.org.au

NSW Business Chamber
Australian Business Centre
140 Arthur Street
NORTH SYDNEY NSW 2060
Telephone: 13 26 96
Facsimile: 1300 655 277
Email: navigation@australianbusiness.com.au
Website: www.australianbusiness.com.au

Tasmanian Chamber of Commerce and Industry Ltd
GPO Box 793
HOBART TAS 7001
Telephone: 03 6236 3600
Facsimile: 03 6231 1278
Email: admin@tcci.com.au
Website: www.tcci.com.au

Victorian Employers' Chamber of Commerce & Industry
GPO Box 4352
MELBOURNE VIC 3001
Telephone: 03 8662 5333
Facsimile: 03 8662 5367
Email: vecci@vecci.org.au
Website: www.vecci.org.au

NATIONAL INDUSTRY ASSOCIATIONS

ACCORD
Dalgety Square
Suite C7, 99 Jones Street
ULTIMO NSW 2007
Telephone: 02 9281 2322
Facsimile: 02 9281 0366
Email: bcapanna@acspa.asn.au
Website: www.acspa.asn.au

Agribusiness Employers' Federation
GPO Box 2883
ADELAIDE SA 5001
Telephone: 08 8212 0585
Facsimile: 08 8212 0311
Email: aef@aef.net.au
Website: www.aef.net.au

Air Conditioning and Mechanical Contractors' Association
30 Cromwell Street
BURWOOD VIC 3125
Telephone: 03 9888 8266
Facsimile: 03 9888 8459
Email: deynon@amca.com.au
Website: www.amca.com.au/vic

Association of Consulting Engineers Australia (The)
75 Miller Street
NORTH SYDNEY NSW 2060
Telephone: 02 9922 4711
Facsimile: 02 9957 2484
Email: acea@acea.com.au
Website: www.acea.com.au

Australian Beverages Council Ltd
Suite 4, Level 1
6-8 Crewe Place
ROSEBERRY NSW 2018
Telephone: 02 9662 2844
Facsimile: 02 9662 2899
Email: info@australianbeverages.org
Website: www. australianbeverages.org

Australian Hotels Association
Level 1, Commerce House
24 Brisbane Avenue, BARTON ACT 2600
Telephone: 02 6273 4007
Facsimile: 02 6273 4011
Email: aha@aha.org.au
Website: www.aha.org.au

Australian Made, Australian Grown Campaign
Suite 109, 161 Park Street
SOUTH MELBOURNE VIC 3205
Telephone: 03 9686 1500 or 1800 330 520
Facsimile: 03 9686 1600
Email: ausmade@australianmade.com.au
Website: www.australianmade.com.au

Australian Mines and Metals Association
Level 10
607 Bourke Street
MELBOURNE VIC 3000
Telephone: 03 9614 4777
Facsimile: 03 9614 3970
Email: vicamma@amma.org.au
Website: www.amma.org.au

Australian Paint Manufacturers' Federation Inc
Suite 1201, Level 12
275 Alfred Street
NORTH SYDNEY NSW 2060
Telephone: 02 9922 3955
Facsimile: 02 9929 9743
Email: office@apmf.asn.au
Website: www.apmf.asn.au

Australian Retailers Association
Level 2
104 Franklin Street
MELBOURNE VIC 3000
Telephone: 03 9321 5000
Facsimile: 03 9321 5001
Email: vivienne.atkinson@vic.ara.com.au
Website: www.ara.com.au

Bus Industry Confederation
PO Box 5112
BRADDON ACT 2612
Telephone: 02 6247 5990
Website: www.ozebus.com.au

Live Performance Australia
Level 1, 15-17 Queen Street
MELBOURNE VIC 3000
Telephone: 03 9614 1111
Facsimile: 03 9614 1166
Email: info@liverperformance.com.au
Website: www.liveperformance.com.au

Master Builders Australia Inc.
16 Bentham Street
YARRALUMLA ACT 2600
Telephone: 02 6202 8888
Facsimile: 02 6202 8877
Email: enquiries@masterbuilders.com.au
Website: www.masterbuilders.com.au

Australian International Airlines Operations Group
c/- QANTAS Airways
QANTAS Centre
QCA4, 203 Coward Street
MASCOT NSW 2020
Telephone: 02 9691 3636

National Fire Industry Association
PO Box 6825
ST KILDA RD CENTRAL VIC 3000
Telephone: 03 9865 8611
Facsimile: 03 9865 8615
Email: info@nfia.com.au
Website: www.nfia.com.au

National Retail Association Ltd
PO Box 91
FORTITUDE VALLEY QLD 4006
Telephone: 07 3251 3000
Facsimile: 07 3251 3030
Email: info@nationalretailassociation.com.au
Website: www.nationalretailassociation.com.au

Oil Industry Industrial Association
c/- Shell Australia
GPO Box 872K
MELBOURNE VIC 3001
Telephone: 03 9666 5444
Facsimile: 03 9666 5008

Pharmacy Guild of Australia
PO Box 7036
CANBERRA BC ACT 2610
Telephone: 02 6270 1888
Facsimile: 02 6270 1800
Email: guild.nat@guild.org.au
Website: www.guild.org.au

Plastics and Chemicals Industries Association Inc
Level 1, Unit 7, 651 Victoria Street
ABBOTSFORD VIC 3067
Telephone: (03) 9429 0670
Facsimile:(03) 9429 0690
Website: www.pacia.org.au

Printing Industries Association of Australia
25 South Parade
AUBURN NSW 2144
Telephone: 02 8789 7300
Facsimile: 02 8789 7387
Email: info@printnet.com.au
Website: www.printnet.com.au

Master Plumbers and Mechanical Services Association Australia (The)
525 King Street
WEST MELBOURNE VIC 3003
Telephone: 03 9329 9622
Facsimile: 03 9329 5060
Email: info@mpmsaa.org.au
Website: www.plumber.com.au

National Baking Industry Association
Head Office:
Bread House
49 Gregory Tce
Spring Hill QLD 4000
Phone: 1300 557 022
Email: nbia@nbia.org.au
Website: www.nbia.org.au

National Electrical and Communications Association
Level 4, 30 Atchison Street
ST LEONARDS NSW 2065
Telephone: (02) 9439 8523
Facsimile: (02) 9439 8525
Website: www.neca.asn.au

Restaurant & Catering Australia
Suite 32
401 Pacific Highway
ARTARMON NSW 2604
Telephone: 02 9966 0055
Facsimile: 02 9966 9915
Email: restncat@restaurantcater.asn.au
Website: www.restaurantcater.asn.au

Standards Australia Limited
286 Sussex Street
SYDNEY NSW 2000
Telephone: 1300 65 46 46
Facsimile: 1300 65 49 49
Email: mail@standards.org.au
Website: www.standards.org.au

Victorian Automobile Chamber of Commerce
7th Floor
464 St Kilda Road
MELBOURNE VIC 3000
Telephone: 03 9829 1111
Facsimile: 03 9820 3401
Email: vacc@vacc.asn.au
Website: www.vacc.motor.net.au