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# Submission DR126 - Australian Chamber of Commerce and Industry - Migrant Intake into Australia - Public inquiry

January 2016



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Chamber of Commerce  
and Industry

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## Summary of Recommendations

The Australian Chamber of Commerce and Industry views the Productivity Commission's Draft Report on the Migrant Intake into Australia as a valuable contribution to the important discussion around migration. The Report provides strong evidence of the benefits of migration and finds that skilled migrants make a major economic contribution and should therefore constitute a significant component of the total migration quota.

The Australian Chamber supports the Commission's conclusion that migration based on fees is not appropriate for Australia as it does not guarantee the current approach's demographic and economic dividend.

This submission concentrates on three areas: recommending further Government effort on issues canvassed in the report; addressing requests in the draft report for further information in areas relevant to business; and identifying issues where the Australian Chamber disagrees with the draft report.

### **Recommendation 1: Promote better community understanding of the value of skilled migration**

That the Federal Government, working with state and territory governments and key stakeholders, develop and implement a communications strategy that strongly reinforces the benefits of migration and explains that a balanced migration program, emphasising skilled migration, creates jobs for Australians through a growing economy.

### **Recommendation 2: Improve whole-of-government labour market analysis**

That the Federal Government establishes better resourced and more effective labour market analysis and forecasting, and works with state governments for a more coordinated approach to labour market planning.

### **Recommendation 3: CSOL should remain the basis of both ENS and 457 visas**

CSOL is, and should be a comprehensive list of all skilled occupations. It should continue to be used for the temporary skilled and the employer nomination elements of the permanent skilled migration scheme in order for those schemes to be responsive to the individual circumstances of employers.

**Recommendation 4: Determine a better system than SOL for independent skilled migration**

Through consultation, identify and implement a more nuanced approach to the allocation of points and quotas to skilled occupations in the independent skilled migration stream as a replacement to the Skilled Occupation List.

**Recommendation 5: Labour market testing for the temporary skilled migration program should be abolished**

Based on the lack of evidence of its effectiveness and due to the high regulatory burden, labour market testing in the 457 visa program should be abolished.

**Recommendation 6: Undertake an updated evaluation of the contribution of the working holiday maker program**

Instead of initiating another inquiry, of which the migration program has had many, the Department of Immigration and Border Protection should commission an updated study of the contribution of the working holiday maker scheme in order to identify the economic contribution and benefit to industries of the program.

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# 1 Introduction

The Draft Report on the Migrant Intake into Australia released by the Productivity Commission is a comprehensive summary of migration to Australia and its impact, and as such is a valuable contribution to the important discussion around migration. The Commission's rejection of a price-based approach to migration is fully supported by the Australian Chamber.

This submission highlights those issues where the Australian Chamber:

- recommends further Government effort on issues canvassed in the report;
- addresses requests in the draft report for further information in areas relevant to business; and
- disagrees with the draft report.

# 2 Benefits of migration and the importance of the mix

The Australian Chamber supports the commentary and findings in the draft report about the economic and social benefits of migration. The report has effectively captured the value and correctly identified the importance of the migration mix, including the benefits obtained from an increased skilled migrant intake.

As the draft report states:

*This inquiry shows that immigrants who are relatively young and skilled make a positive contribution to Australia. (page 3)*

*The shift to a focus on skilled immigration, while maintaining opportunities for immigration by people who have close family connections, or humanitarian needs, has delivered relatively good economic and social outcomes overall, both for the immigrants themselves and for the broader community. (page 4)*

*[S]killed immigration (including Temporary Work (skilled) 457 visa holders) generates a relatively large positive net fiscal impact. (page 12)*

The Australian Chamber believes the Commission's final report should even more strongly encourage all federal, state and territory governments as well as community leaders to highlight the benefits of migration. This is necessary to counter the misleading voices of those people who (as the draft report mentions on page 8) put forward a "manifestation of the lump of labour fallacy — that there is a fixed number of jobs in an economy".

The Australian Chamber remains very concerned that the Australian migration program has been undermined by commentary and ongoing inquiries that create and/or reinforce community perceptions that employment is a zero-sum game – that jobs can be "taken" by overseas workers. Australia's long-term economic performance, and the growth in the workforce over that time, together with the Commission's analysis in its draft report, has proven beyond doubt that a balanced migration program has increased jobs for Australians, and has enhanced and not detracted from opportunities for Australians.

Recent campaigns run primarily by the Unions including those around the changes to the 457 visa program in June 2013 and the labour market provisions of the China-Australia Free Trade Agreement in 2015 – have confused the community about the potential for foreign workers to “take” Australian jobs.

Adding to the confusion, some stakeholders suggest that permanent migration is fine but temporary skilled migration is not. This is illogical and ignores the benefit of someone coming temporarily in advance of making a permanent commitment. Arguing that permanent migration is fine but temporary migration is not is politically convenient, but ignores logic and evidence.

Community understanding would improve if the Federal Government and stakeholders explained the migration program relative to the size of the total labour force. A diagram developed by the Australian Chamber for the Senate Inquiry into Temporary Migration (at Appendix A) illustrates the impact of skilled migration.

### **Recommendation 1: Promote better community understanding of the value of skilled migration**

That the Federal Government, working with state and territory governments and key stakeholders, develop a communications strategy that strongly reinforces the benefits of migration and explains that a balanced migration program, emphasising skilled migration, creates jobs for Australians through a growing economy.

## 3 Labour market analysis and evidence

Throughout the draft report, the Productivity Commission emphasises the importance of data and labour market evidence. The Australian Chamber reinforces our previous advice through related submissions that the Federal Government needs to significantly improve its overall approach to labour market analysis. This was a recommendation of the 2014 Azarias Review that was strongly advocated and supported by the Australian Chamber.

Labour market analysis expertise and resources are spread across a range of departments including Immigration and Border Protection, Education and Training, Industry, Innovation and Science, and Employment, as well as the specific workforce planning undertaken in Health and Defence. State governments also have specialist labour market planning teams. A more coordinated approach, which would yield better outcomes and a more informed market, is strongly recommended.

The now discontinued Australian Workforce and Productivity Agency previously undertook work in this area and those resources went to the Department of Industry on wind up in July 2014. However responsibility for determining the composition of the Skilled Occupation List has ended up with the Department of Education and Training. Given the lack of dedicated resources, it is

inappropriate that the Department of Education and Training undertakes the analysis of the Skilled Occupation List.

We note draft finding 4.1:

*Decisions about the level of immigration are the responsibility of the Australian Government. They involve balancing a complex set of economic, social and environmental policy objectives.*

*There is no comprehensive empirical basis for setting an aggregate level of immigration over time that would improve the wellbeing of the Australian community. Improving incumbents' wellbeing is likely to be consistent with a range of immigration rates, which is determined (among other things) by the efficiency of the provision of infrastructure, the efficiency of the labour market, technology, settlement services and external factors.*

The Australian Chamber agrees that determining the level of immigration is complex. Therefore decisions will be significantly enhanced with sound labour market analysis and an evidence-based approach. This will not be a “comprehensive empirical basis” for setting permanent and temporary migration levels given political, economic and social factors need to be considered, but it will significantly enhance the current approach.

## **Recommendation 2: Improve whole-of-government labour market analysis**

That the Federal Government establishes better resourced and more effective labour market analysis and forecasting, and works with state governments for a more coordinated approach to labour market planning.

### **3.1 Skills lists – SOL and CSOL**

An improved approach to labour market analysis will significantly benefit the definition and use of the two key lists – the Skilled Occupation List (SOL) and the Consolidated Sponsored Occupations List (CSOL). The roles of the SOL and CSOL are critical to migration decisions and it is important to consider whether the SOL process is the most appropriate mechanism to decide upon occupations in the independent skilled migration stream.

This section addresses the draft report's information request 11.1:

*The Commission seeks feedback on the use of the Consolidated Sponsored Occupations List in the immigration pathway from temporary to permanent employer sponsored skilled immigration. Is the list sufficient to allow both temporary skilled (subclass 457) visas and employer nominated permanent visas to meet their stated objectives?*

Generally, and as the report identifies, skilled occupations are those included in skill levels 1, 2 and 3 of the ANZSCO occupation lists published by the Australian Bureau of Statistics. This list, and



the translation into the CSOL, is not perfect but can hardly be described as “arbitrary” (page 25 of the draft report, in the heading “The ‘skilled lists’ seem arbitrary”).

The Azarias Review (quoted in the draft report) recognised the imperfect nature of the translation, noting that industry parties could strongly argue that new or existing occupations were not properly identified in ANZSCO, either at all, or not properly classified as skilled. Therefore, the recommendation for occupations to be added to CSOL on the basis of evidence was proposed and supported by the Australian Chamber.

Importantly, it was not recommended by the Azarias Panel that occupations classified as skilled be removed from CSOL, except on integrity grounds. In other words, CSOL is and should be a comprehensive list of all skilled occupations. This is in contrast to the SOL, where there is a process of determining which occupations are in shortage, and occupations are added, removed or “flagged”.<sup>1</sup>

The draft report correctly identifies that CSOL is used for both the temporary skilled migration program and the Employer Nomination Scheme of the permanent stream. It is critical that CSOL, being a comprehensive list of all skilled occupations, remains the reference point for both, and must not operate as a list of occupations in shortage. Both the 457 and ENS programs are designed to respond to the needs of individual employers in locations where they are experiencing shortages. No amount of economy-wide labour market analysis can validate individual experiences, but yet the lack of skilled staff could impact not just on that business, but its other employees and its community.

The ENS program has much stronger employment outcomes than the independent skilled migration stream. There is no reason to limit the responsiveness of the scheme to the needs of individual employers by limiting the occupations other than through the lens of being “skilled” (except in the few cases where there are integrity concerns).

The report discusses whether there should be an extra regulatory framework or criteria around the ENS to recognise the perceived lack of employer incentive in long-term economic outcomes (page 30). The Australian Chamber would not support such an approach. The success of the ENS, including its favourable employment outcomes, arises from its responsiveness, so further restrictions would not be beneficial.

Employment history with the nominating employer will in most cases provide a strong scaffold for long-term employment outcomes should the employee move on from the original employer. If demand for CSOL occupations drops (as is speculated in the report) then the migrant has the same option as with Australian workers – they can seek a role in another suitable occupation that can build on their positive work history.

### **Recommendation 3: CSOL should remain the basis of both ENS and 457 visas**

CSOL is, and should be a comprehensive list of all skilled occupations. It should continue to be used for the temporary skilled and the employer nomination elements of the permanent skilled

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<sup>1</sup> “Flagged” means that occupations are listed as in shortage, but there is evidence these shortages are diminishing.

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migration scheme in order for those schemes to be responsive to the individual circumstances of employers.

In relation to the independent skilled stream, which is currently informed by the Skilled Occupation List (SOL), economy-wide labour market analysis is very relevant, as these applicants have to approach the labour market without a sponsor and there needs to be some basis for confidence that they will secure a position that suits their skills and experience.

The Australian Chamber recommends that there should be a review of the mechanism of using the SOL and its processes to arrive at occupations that are relevant to applications from independent skilled migrants. There is an opportunity to apply a more nuanced approach to decisions about occupations based on bringing together detailed labour market analysis and the relatively recent SkillSelect process.

SkillSelect creates an opportunity for a rethink on the methodology used to determine occupations for general skilled migration pathways. Under the current SkillSelect model, intending migrants must “pass” a points test to be considered for general skilled migration. Points are allocated against criteria including the level of qualification, work experience and English-language ability.

An enhanced approach to labour market analysis could base the pass mark for individual occupations currently on the Consolidated Sponsored Occupations List (CSOL) on labour market conditions and emerging demand. The Australian Chamber believes this would be much more flexible and responsive, enabling required points to be adjusted as labour market conditions change.

Additional levers to increase or decrease the flow of migrants in certain occupations can be applied within the SkillSelect process through the use of occupation ceilings. These are currently in place, but are set at a uniform percentage level, rather than reflecting occupations in demand. Rather than being uniform, these caps could allow for limited migration in occupations that are currently off the list, and also lower the caps for those occupations currently “flagged”. This cap should only apply to the independent skilled migration process.

The Australian Chamber recommends that the Department of Immigration and Border Protection, the Department of Education and Training and the Department of Employment meet with industry stakeholders to discuss possibilities arising from SkillSelect and the demand-driven options available by using SkillSelect as a driver of skills supply by more effective points allocations and occupational quotas.

#### **Recommendation 4: Determine a better system than SOL for independent skilled migration**

Through consultation, identify and implement a more nuanced approach to the allocation of points and quotas to skilled occupations in the independent skilled migration stream as a replacement to the Skilled Occupation List.

## 4 Temporary skilled migration (457 visa program)

The temporary skilled migration scheme is strongly supported by the business community as a vital and responsive element of overall workforce planning.

### 4.1 Labour market testing

The Australian Chamber disagrees with the draft report's support for labour market testing (LMT) as it cannot be sufficiently improved to become effective.

The draft report says:

*While the Commission supports labour market testing under the 457 visa program, the current arrangements need to be reformed to improve their effectiveness and efficiency. The continuing need for labour market testing should be reviewed in the light of how successful the new arrangements for assessing skill shortages prove to be. (page 291).*

The Commission presents no evidence as to why it is “sensible for the moment” (page 313) to retain labour market testing. LMT theoretically aims to give job opportunities to Australians first but in reality the process cannot achieve the objective.

LMT is akin to asking employers to walk through wet cement. It imposes a regulatory burden that will discourage some employers. This is not good policy as it does not allow the program to respond to need.

The number of visas granted for trade occupations has fallen since LMT was reintroduced in 2013. But there are several factors influencing this fall, including the introduction of the “genuineness” test at the same time, the work of the Fair Work Ombudsman and Department of Immigration and Border Protection in ramping up compliance, and a fall in economic conditions in industries accessing the program, including mining.

457 visa sponsors are obliged to commit to employing Australians first in the program, regardless of whether LMT is in place. This obligation exists for occupations that are exempt from LMT and existed before LMT was reintroduced in July 2013.

The ineffectiveness of LMT is best explained by example:

Assume there are four motor mechanic businesses in a large regional town, and employers have long found it hard to attract mechanics to live and work there. If a mechanic leaves suddenly for personal reasons, their employer knows it will be difficult to replace them and their business and customers will suffer if someone is not found quickly. LMT imposes a regulatory barrier between the need for and delivery of skills. Although it is more costly for the business to hire someone from overseas (another barrier to employing a 457-visa holder) they need to do it to keep their business growing and delivering.

Let us turn this example around to reflect union concerns. Say there is usually no problem sourcing mechanics in this regional town, but a skilled mechanic on a working holiday

maker visa picked up a short-term job with a mechanic shop during a busy period, and when the other mechanic leaves suddenly, the working holiday maker is offered that job under a sponsored 457 visa as the business likes their work and they have fitted into the team effectively.

No amount of LMT requirements would prevent that outcome. The business would advertise, and demonstrate in their 457 application that they advertised and considered applicants but they were found unsuitable. If an employer is determined to employ a particular person, it is hard to design regulation that would prevent that outcome. So LMT would not help in achieving compliance with the objective of employing Australian workers when available.

What does help for most genuine employers, and exists without LMT, is the threshold obligation, as those employers will be confronted with needing to be dishonest when they attest that they employ Australians first.

LMT is contentious because the unions deliberately confuse the obligation to employ Australians first with the regulatory burden of advertising, suggesting that without LMT there is no obligation. This is completely wrong. The Commission should acknowledge that the obligation and overall objectives of the program are important, and the Department of Immigration and Border Protection should monitor the impact on the labour market in a smarter, more evidence-based way, to identify problems.

The Australian Chamber concurs with the recommendation of the Azarias Review that LMT should be removed from the 457 program for the reasons outlined here and in the review final report.

### **Recommendation 5: Labour market testing for the temporary skilled migration program should be abolished**

Based on the lack of evidence of its effectiveness and due to the high regulatory burden, labour market testing in the 457 visa program should be abolished.

## **4.2 Should 457 visas be capped?**

Information request 9.2 states:

*The Commission seeks feedback on the merit of caps on temporary 457 visa numbers for specific occupations. It is particularly interested in participants' views on whether the recommendations from the Independent Review into Integrity in the Subclass 457 Programme (the Azarias Review) — and which have been supported by the Australian Government — are likely to lead to the more accurate identification of genuine labour market shortages for occupations on the Consolidated Sponsored Occupations List.*

The Australian Chamber agrees with the draft report that caps for 457s at this stage are not warranted. As identified in the Azarias Review, in most occupations on the CSOL, less than 1 per

cent of the total workforce in that occupation are temporary skilled migrants. However, the percentage for some occupations is much higher, and this is often worthy of further investigation.

Caps should be the last resort, and only used if industry action to address a higher percentage (for example, greater than 5-10 per cent of the workforce in that occupation over time) was unsuccessful and there was evidence Australian workers were available to undertake the work. More beneficial than caps would be action by industry, based on the high 457 visa usage, to develop local workers to take up the opportunities, or action to change business models affecting recruitment practices.

Transparency through the rigorous application of evidence is the most effective way to encourage industry and stakeholders to act. At present, the uncoordinated approach to labour market analysis and planning means there is no appropriate mechanism to properly present this evidence to stakeholders.

### **4.3 English language proficiency**

The draft report rightly emphasises the importance of English language proficiency in employment and social outcomes. However, particularly in relation to 457 visas and also in the progression from 457 to ENS, it is appropriate that there is recognition that the proficiency is not as critical in some occupations (such as a chef in an Asian restaurant), and that applicants' social and employment outcomes will not be harmed if the "bar" is set slightly lower. The draft report supports the notion that the transition to ENS from a 457 should not have English language concessions (page 30). The Australian Chamber does not support this proposition, suggesting instead that in most cases employment under a 457 visa has appropriately prepared the individual to progress to a permanent ENS application.

## **5 Working holiday makers**

The Australian Chamber agrees with the draft report's conclusion that quotas and restrictions on the working holiday maker (WHM) program are not warranted on the basis of current information (page 304). The program is of significant value in terms of its cultural exchange, its economic contribution through tourism, and its ability to meet seasonal and casual labour shortages, particularly in regional areas.

The draft report comments on a commonly raised concern: the extent to which WHMs displace unemployed Australians, particularly young people. Again, we agree with the draft report that there is little evidence of this displacement.

The Australian Chamber believes that the key reason for this is the different characteristics that WHMs bring to the labour market compared with young unemployed Australians. This makes substitution very difficult and so displacement does not occur.

The Australian Chamber has looked at this issue in some detail and has identified the key characteristics that have led to WHMs' high value in the overall labour market:

- Mobility – a major issue for regional Australia, and a vital characteristic in a country with a very geographically dispersed industry need. WHM's are not only willing to relocate for work, but are positively seeking travel and work experiences.
- Suitability for casual and seasonal work – the short-term nature of the visa and the work-right limitations match the needs of tourism and agriculture, which offer this type of work.
- Enthusiasm and willingness to work in unskilled jobs –an understanding that the work is helping to fund travel creates a different approach to the work.
- Experience with work-ready skills –many WHMs are highly educated.

These characteristics closely match the needs of growing sectors of the Australian economy, including tourism, hospitality and agriculture, and the unique geographic challenges of our country. The Australian Chamber believes that a focused project with suitable unemployed young Australians may give them some of these characteristics, and this should be explored through a pilot project. However, this approach will not yield the scale required in tourism and agricultural, and we need to recognise, even celebrate, that the WHM scheme is ideally suited to these growing industries.

## 6 Another inquiry into temporary migrant work rights?

The Australian Chamber does not support draft recommendation 9.1:

*The Australian Government should commission a public inquiry into the labour market and broader economy-wide effects of work rights for international students, temporary graduate visa holders and working holiday makers.*

Given the Senate Inquiry into Temporary Migration is still underway, another inquiry would put at further risk the reputation of migration. Inquiries imply there is a problem to be addressed – a proposition not supported by the Australian Chamber. This is not to deny the significant compliance issues that need to be addressed through education and effective enforcement. However, the existing regulatory environment should be sufficient and it is important to keep these concerns within the context that these temporary migration programs contribute to the economy through the export of tourism and education, and the addition of casual or seasonal labour.

Also, specifically regarding student visas, any activity should be undertaken in the context of the upcoming National Strategy for International Education. In the draft strategy the conditions around student and graduate visas were identified as a significant part of the export offering to potential students.

Instead of an inquiry, it would be worthwhile if the Department of Immigration and Border Protection invested in an updated survey of working holiday makers (last conducted in 2008<sup>2</sup>,

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<sup>2</sup> Tan, Y. et al 2009, Evaluation of Australia's Working Holiday maker (WHM) Program, Adelaide: National Institute of Labour Studies.



when the program was more modest) and published the results. This will add to the evidence of the benefits of the program and help to understand the activities and contribution of the WHMs.

**Recommendation 6: Undertake an updated evaluation of the contribution of the working holiday maker program**

Instead of initiating another inquiry, of which the migration program has had many, the Department of Immigration and Border Protection should commission an updated study of the contribution of the working holiday maker scheme in order to identify the economic contribution and benefit to industries of the program.

## 7 About the Australian Chamber

### 7.1 Who we are

The Australian Chamber of Commerce and Industry speaks on behalf of Australian business at home and abroad.

We represent more than 300,000 businesses of all sizes, across all industries and all parts of the country, making us Australia's most representative business organisation.

We speak on behalf of the business sector to government and the community, fostering a culture of enterprise and supporting policies that keep Australia competitive.

We also represent Australian business in international forums.

Our membership comprises all state and territory chambers of commerce and dozens of national industry associations. Individual businesses also get involved through our Business Leaders Council

### 7.2 What we do

The Australian Chamber strives to make Australia a great place to do business in order to improve everyone's standard of living. We seek to create an environment in which businesspeople, employees and independent contractors can achieve their potential as part of a dynamic private sector. We encourage entrepreneurship and innovation to achieve prosperity, economic growth and jobs.

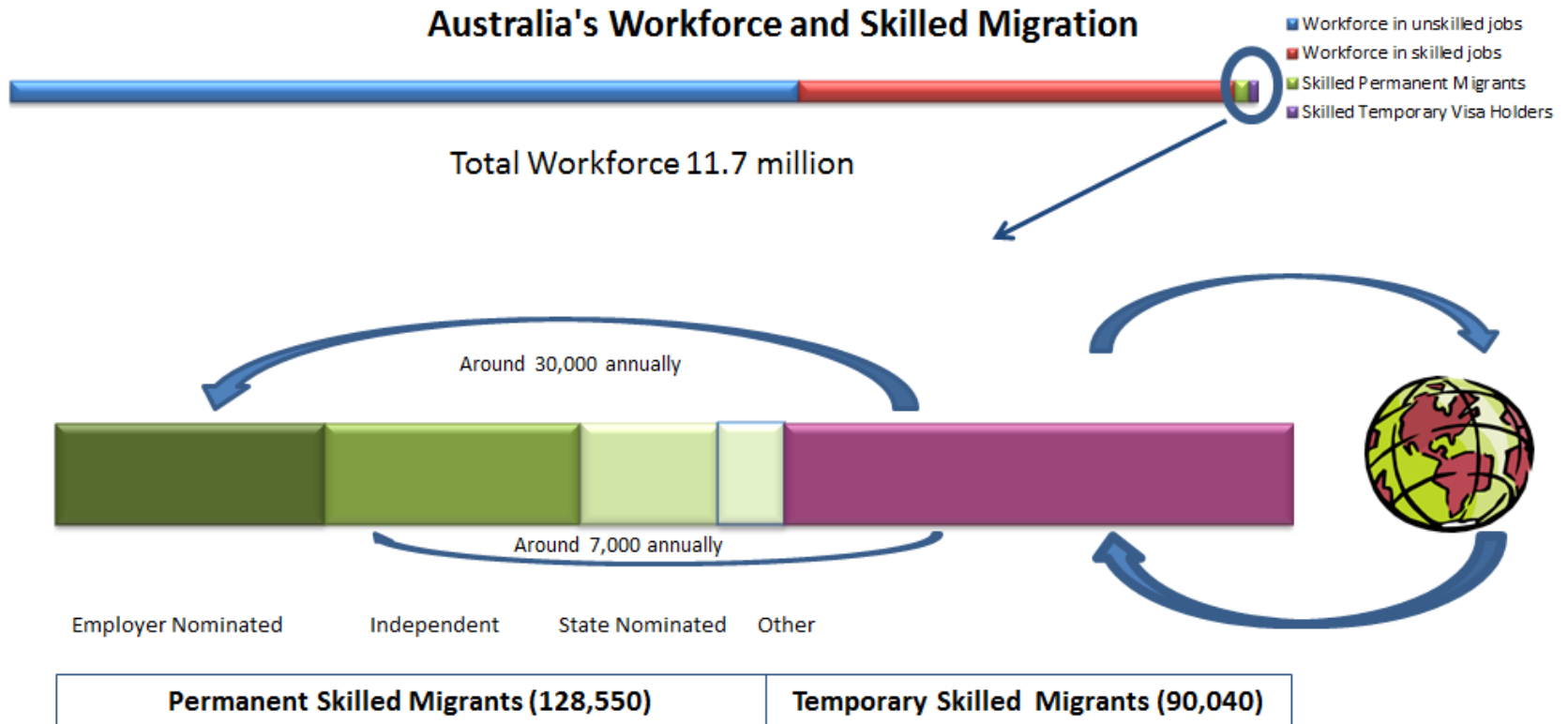
We focus on issues that impact on business, including economics, trade, workplace relations, work health and safety and employment, education and training.

We advocate for Australian business in public debate and to policy decision-makers, including ministers, shadow ministers, other members of parliament, ministerial policy advisors, public servants, regulators and other national agencies.

We represent the broad interests of the private sector rather than individual clients or a narrow sectional interest.



**Skilled migration in Australia in the context of the total labour force**



## Australian Chamber Members

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