



ACCI SUBMISSION

Productivity Commission

Default Superannuation Funds in Modern
Awards – Productivity Commission Draft Report

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1. ABOUT ACCI

1.1 Who We Are

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

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

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

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

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

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

1.2 What We Do

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

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

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

Our specific activities include:

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

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2. INTRODUCTION

1. This is ACCI's submission to the Productivity Commission's (Commission) draft report, "Default Superannuation Funds in Modern Awards – Productivity Commission Draft Report", (Draft Report). The Draft Report follows a request on 6 February 2012 by the Assistant Treasurer asking the Commission to design criteria for the selection of funds eligible for nomination as default funds in modern awards by Fair Work Australia (Request).
2. ACCI's submission focuses on the employer's experience of the superannuation system and the potential impact of the proposed changes. As ACCI has earlier submitted, there is quite a degree of overlap of employer and employee (member) interest in how the superannuation system operates. Both clearly have an interest in system and fund efficiency: employers because of their interaction with the system as sponsors and because it is not in the employer's interest for the superannuation system to operate badly or provide poor experiences to its employees. It is not in employers' interests for superannuation to be difficult to deal with, difficult to understand or perform poorly.

3. KEY ISSUES

3. The Request presumes the continuation of award regulation of superannuation. While many of those with an interest in superannuation support award-based regulation of superannuation and the role of awards in nominating funds for default contributions (contributions into a fund which is not "chosen"), it is not certain that regulating many employers' superannuation obligations through the award system in addition to its regulation by the superannuation legislation is efficient.
4. Award regulation of superannuation is not consistent at all times with superannuation guarantee legislation. It is also not certain that dual regulation assists employers to understand their obligations, or to make them more confident that they are on top of their obligations.¹

¹ For example, when the *Superannuation Guarantee (Administration) Act 1992* was amended in 2008 to replace the "notional earnings base" with a statutory standard notion of "ordinary time earnings" (OTE) as the basis for calculating the 9% contribution required to avoid a superannuation guarantee charge the result was that employers could rely on neither the award nor the legislation to be certain of their contribution obligation. This was because 9% of OTE was required under the legislation to avoid the guarantee charge and the award terms had to be complied with to avoid a breach under the industrial legislation. Employers not only had to observe both but also understand that fact and understand the relationship between the two sources of regulation.

The recommendations

5. The Commission examined four options:
 - i. All defaults authorized to offer MySuper available for selection. This could be achieved by removing all superannuation provisions from modern awards or excluding fund nomination from modern awards.
 - ii. Continue with existing practice but require that where funds are nominated in modern awards that between 5 and 10 fund names are provided.
 - iii. Alter the current process so that assessment of the funds to be named in a modern award falls to a specialist panel within FWA, including members with external expertise, with applications to be made by aspiring funds and the assessment based on a non-industrial member-interest framework of criteria.
 - iv. Alter the current process so that assessment of the funds to be named in a modern award falls to a specialist expert panel external to FWA, with applications to be made by aspiring funds and the assessment based on a non-industrial member-interest framework of criteria.
6. The Commission did not find favour with options 1 and 2. The Draft Report concludes that either option 3 or 4 best fits the interests of members and employer needs. It proposes that modern awards would nominate between 5 and 10 different funds and, that for a fund, nomination into a modern award should be contestable.
7. The Draft Report also proposes that the assessment process is linked in with the 4 yearly modern award review process (although not necessarily undertaken by FWA). The proposal is that funds would contest for award nomination in concert with the 2014 review and each 8 years thereafter with a lighter-touch review each 4 years after nomination.
8. The Commission proposes that this lighter-touch review would really be to remove inappropriate and closed funds, and not add new funds. This proposal might be reconsidered for two reasons. First, ACCI strongly recommends that modern awards should be varied at the time a fund closes so that they properly prescribe the current range of funds which is available as defaults. “At-time” variation is implicit in the Commission’s proposal that there is on-going review, but even if not, an instrument which imposes legal obligations should not mislead about those obligations.
9. Second, there may be a case for allowing new applications at the time of the light-touch review, or continuously, in the event that the number of funds, or number of funds with unrestricted access, in an award drops too low.

10. “At-time variation” suggests that superannuation terms in modern awards are dealt with differently from other award terms. This question is dealt with further below under “*Timing the transition*”.

Regulatory burden

11. Much has been made of the burden on employers of selecting the appropriate default. It is true that many employers are not well equipped to select a default fund, or to review the operation of a current default fund. The little evidence available about default fund usage suggests that employers do not often change default funds, and therefore do not often select defaults.
12. Defaults are usually selected when a new employer becomes aware of its superannuation obligations. For employers already making default contributions, new default funds are selected when an existing default cannot accept contributions for a default employee or when an employer is motivated to go elsewhere after a bad experience with an existing default or continuing poor performance. A new default is required when a fund closes.
13. There are good reasons why employers do not readily move between default funds. Apart from the search costs and knowledge barriers associated with selecting a new default to which the Draft Report draws attention, becoming a “participating employer” (a standard employer sponsor) of a fund is itself onerous. Becoming a standard employer sponsor requires the employer to establish the contractual relationship with the new fund and comply with terms of the new arrangement (which may differ from the arrangement with the former default fund).
14. When an employer moves to a new default fund the employer must enrol all the employees who had default contributions being made into the former fund into the new fund (which may require different information from that required by the former fund) and issue a standard choice form to all those employees. The employer must also deal with any chosen fund prompted by the choice form being issued.
15. This “stickiness” of default funds partly explains why nomination as a “fund” in awards reduces the need for the fund to address service efficiency. SuperStream should significantly improve the enrolment burden, and may improve the process of, and reduce fund-specific obligations arising from, becoming a standard employer sponsor, but SuperStream will not remove standard choice form obligations. Even if SuperStream reduces the administration of default fund movement in the choice regime, some of this “stickiness” will remain.

Fund “closure”

16. There are two other circumstances which require an employer to select a new default: closing off a corporate fund or scheme or fund amalgamation.
17. Where a corporate fund (or scheme) is closed off it is reasonable to assume that the employer is able to make a reasonable selection for the new default and is motivated to pay the set-up costs. Second, only that employer and those members are affected.
18. Fund amalgamation has a more extensive impact. From the employer's (and members') perspective there is also an effective fund “closure” with fund amalgamation. Typically one of the amalgamating funds ceases to exist. This requires another default fund to be selected, and typically many employers are affected. For many, the successor fund becomes the new default fund. The information which the employers and members receive, which is mainly from the amalgamating fund, stresses continuity and is directed towards that outcome.²
19. Such an outcome may not be inconsistent with the SIS Act. It is consistent with the current standard modern award superannuation clause which provides for complying contributions to be made to the identified funds or successor funds. This outcome may be consistent with the framework adopted by the Commission to assess its options.
20. In finalizing its recommendations the Commission may wish to give consideration to the question of whether when a fund nominated in a modern award amalgamates there should be a review to determine whether the amalgamated entity should be nominated. At the very least ACCI would expect that the “closed” fund is excised from the modern award.

The context of the inquiry

21. The implementation of Stronger Super provides the background to the Commission's inquiry. The requirement that default contributions from 1 October 2013 will need to be made into a fund authorized to offer a MySuper product, and that modern awards will only prescribe funds authorized to offer MySuper products has implications for the superannuation system and how it affects employers.
22. The number of funds currently accepting default contributions will contract. This seems likely for a number of reasons. Some funds currently accepting

² This fund information sometimes obscures the employer's obligations and confuses award and statutory implications. A fund closure arising from an amalgamation also requires the employer to give employees for whom the closed fund is a chosen fund a standard choice form and depending on the timing of any reply from the employee may require that employee to be enrolled into the default fund until such time as a new chosen fund is advised.

default contributions will not receive approval to offer a MySuper product. The requirement for trustees of a MySuper product to consider scale will provide incentive for amalgamations. So does the single MySuper product per fund rule. The introduction of MySuper can also be expected to continue to reduce the number of corporate funds.

23. Consistent with the principle that if modern awards are to nominate default funds into which employees' contributions are to be made they should do so accurately and not mislead, it is important that modern awards are varied sufficiently before 1 October 2013 to accurately prescribe post 1 October 2013 obligations.
24. Adoption of either of the Commission's preferred options will also provide incentive for funds to amalgamate. In the world of MySuper defaults there will be a clear competitive advantage for a fund to be nominated in one or more modern awards and it seems likely that funds offering MySuper products which fail to be nominated in any relevant modern award will seek to amalgamate or perhaps to exit the default field.
25. Contraction of the number of funds offering MySuper products has implications for successive reviews. Fund amalgamations mean that funds offering MySuper products will have increasingly diverse membership in their product. Increase fund "closure" also means that employers may need to select new defaults more often than in the past.

Award v fund coverage

26. As noted in the Draft Report assessing the appropriateness of a particular fund as a default for an award raises the question of the characteristics of the employees to whom the award applies, or at least covers, in comparison to the membership of the fund in whose interests the trustees must invest and organize insurance.
27. Broadly speaking, fund coverage rules pre-dated award modernization and the making of modern awards. Award modernization was essentially a process of consolidating the coverage of numbers of award-based transitional instruments into a relatively small number of modern awards with specific "industry" coverage (limited also by the classification structure of the particular award) and/or, in some cases, specified occupational coverage.
28. The demographics of award coverage are not easy to determine and identifying coverage is made more difficult by the cross-cutting effect of occupational awards which reach across industries but do not necessarily uniquely provide award coverage for the occupations that they cover. Also

there is no specific relationship between modern award coverage and ANZSIC codes.³

29. It may be arguable that early fund coverage rules were influenced by the coverage of the prevailing state and federal awards of the day, but any such relationship would not have been strong even then for a number of reasons. Even in the early days of award prescription of superannuation many awards nominated more than one fund.
30. It is clear that modern awards were not made with industry coverage rules in mind, in fact, rather the reverse. Funds nominated in an award-based transitional instrument tended to make their way into the modern award, or modern awards, which replaced it. The standard modern award superannuation clause allows for default contributions into a fund which received the employer's contributions prior to 12 September 2008 where the fund is not specifically nominated by the modern award. (Under the Commission's preferred options this provision would cease.)
31. There is also something of a tension between too great a focus on award coverage to determine the appropriateness of a particular fund for nomination as a default and the Stronger Super objective of encouraging fund scale. "Fit" between fund and award coverage may decline over time.

Selecting outside the award list

32. Under the Commission's proposals an employer would not be confined to selecting a default from those nominated in the award provided the employer could justify the external selection on the basis that its employees "...will be at least no worse off than if the employer had chosen a listed (sic) award."⁴
33. Many of the Cooper recommendations adopted for Stronger Super were prompted by the fact that the introduction of choice did not bid down fund costs or prices, and that, if anything, the competition between funds was dysfunctional. Some of these problems arise from the particular statutory support given for superannuation contributions. Stronger Super and the Commission's draft recommendations seek to channel inter-fund competition.
34. ACCI supports the view that funds should be exposed to appropriately channelled competition, or at least the threat of it, and that this is necessary to help offset the significant market advantage of award nomination. However for the proposal to provide a credible threat of competition, it

³ P 43, *Analysing modern award coverage using the Australian and New Zealand Standard Industrial Classification 2006: Phase 1 report*, Research report 2/2012, Fair Work Australia, February 2012

⁴ P 15, Draft Report

needs to be viable. Employers would need to be confident that they can comply with the requirement and that compliance is easily demonstrable in the event they were to elect to provide an external default. To make viable the capacity to select a default fund outside the award list, fund assessment for compliance with the “no worse off” test should not impose cost of any significance on the employer, should be based on publicly available information and must not require the employer to obtain legal or financial advice.

35. At the very least the assessment would need to be point in time. Requiring an employer to undertake a regular or periodic review of the “no worse off” test would in all likelihood render the threat of selecting out innocuous. Because of the differences in employer demographics in different industry sectors, to be plausible across the award spectrum, it would seem desirable for small employers to be able to select outside their award with confidence.
36. The draft report seems to contemplate that the question of whether employees will be “no worse off” in the externally selected fund would be determined in the same way as funds would be assessed as a candidate for the modern award covering the employees. This has implications for the body determining fund candidature because it suggests that the information which is needed to make the proposed kind of assessment would have to be publicly available. It also suggests that the information is updated on a regular basis, since an employer will not necessarily contemplate an externally selected default at the time that funds are being assessed for award inclusion.
37. Information of this kind does not seem to be something which funds could be expected to supply in an unconflicted way.
38. The Draft Report also asks who should monitor compliance with the “no worse off” test in the event an employer selects outside the award nominated funds. Selection of the most appropriate enforcement body depends on what is required to demonstrate compliance. The extent to which this capacity to select away from the modern award provides credible competition is dependent on whether employers continue to be indemnified for the selection of the default, and this also is an influence on the selection of the regulator.
39. However, if the Commission proceeds with this part of its recommendations and wishes “external selection” to be a credible option it might wish to consider separating the enforcement of a decision to select externally from general industrial enforcement.

Modern enterprise awards and corporate funds offering a MySuper product

40. The proposed mechanism to allow an employer to select a default which is not nominated in the relevant modern award may have a wider potential than first meets the eye. The Commission's general summary of award prescription of funds, whilst basically correct, does not address two issues of detail which do not easily fit the general description.
41. The first is that there will be modern enterprise awards and there are continuing enterprise award-based transitional instruments (pre-modern awards made under the federal or state systems prior to 1 January 2010) which nominate superannuation funds. The modern award system not only comprises the 122 industry/occupational modern awards which cover multiple employers but the system also provides for modern enterprise awards. A modern enterprise award covers a single employer. The 122 "general" modern awards explicitly do not cover an employer covered by a modern enterprise award or an enterprise award-based transitional instrument.⁵
42. The *Fair Work Act 2009* generally treats modern enterprise awards as modern awards although there are specific modern enterprise awards provisions, including in Part 2-3 Division 7, which provides a specific "modern enterprise awards objective". Although any modern enterprise award could be treated in the same way as any other modern award with respect to MySuper compliance, it is not yet clear how the superannuation provisions of these continuing enterprise award-based transitional instruments will be dealt with.
43. In the case of modern enterprise awards the proposal that between five and ten funds offering a MySuper product are nominated in a modern award would not sensibly apply as a requirement for a modern enterprise award. On the other hand there would seem to be no good reason to preclude a modern enterprise award from nominating more than one fund. If enterprise award-based transitional instruments are required to nominate only funds offering MySuper, and if the Commission's proposals were to also apply to them, the same principle about the number of nominated funds for modern enterprise awards would seem appropriate.
44. A modern enterprise award can be understood as a carve out of a modern award's coverage. The enterprise award may cover a specific employee demographic which may be somewhat different from the more generalised demographic of the modern award. There may be instances where none of the funds nominated in the general modern award are as appropriate for the employees covered by the enterprise award as another fund.

⁵ Under the arrangements for transition into the Fair Work system the coverage of enterprise award-based transitional instruments is excluded from the coverage of modern awards. These enterprise instruments continue to apply until 30 December 2014 and in the mean time they may be terminated, in which case the modern award would then cover the employees, or be modernised, in which case the modern enterprise award would cover the employer indefinitely and the "general" modern award would not.

45. The second matter is that the MySuper legislation provides for large employer funds. A large employer fund can be authorized to offer an employer specific MySuper product open only to that employer's employees. The Commission's discussion does not indicate how these funds might be handled under its proposals. They would seem to be potential candidates for inclusion in a modern award.
46. If the Commission concludes that a large employer fund which is authorized to offer a MySuper product can apply to be nominated in a modern award, as in the case where a fund which is not public offer, or is an EPSSS, is nominated, one would expect its nomination to lead to a greater number of funds in the award (except an enterprise award).
47. Consideration might also need to be given to how to assess and weigh the consequences for employees who terminate from an employer where there is a large employer fund authorized to offer MySuper. The assessment of termination consequences should not be undertaken in a way which defeats the policy of providing large employer funds with the capacity to gain APRA authorization.
48. If the Commission concludes that access to large employer funds authorised to offer MySuper should be provided by the selecting out mechanism, the issue of not defeating the policy of allowing large employer funds to offer MySuper may also be a consideration.

Timing the transition

49. The Draft Report proposes that its recommended fund assessment process is in place so as to take place coincidentally with the first 4-year review of modern awards. In ACCI's view the assessment of funds for inclusion in an award should be driven by different considerations, the most important of which are the timing of Stronger Super and access to reliable data. The reality of both the Commission's preferred options is that the normal processes applying to modern awards, including review and variation, will need to be modified for at least this aspect of their superannuation clauses to give effect to the policy object of the Commission's preferred recommendations.
50. The modern awards objective, and the object of stable award-provided employment conditions, are not the appropriate basis for award determination of default funds for disengaged members on the basis of those members' best interest, and nor is the statutory timing and requirements for award variation under the *Fair Work Act 2009* which were enacted to give effect to that industrial objective. It is true that superannuation is for the long term, and that contributions and fund stability is an important goal, but change of fund events are triggered by matters unrelated to the award review cycle.

51. For employers, and members, the commencement of MySuper is the first major Stronger Super development. This will prompt some changes of default funds, but it does not seem likely that that this will be widespread. It is ACCI's expectation that putting aside applicant large employer funds, the identity of generally available funds (funds with multiple employer sponsors, whether public offer or not) and EPSSs should be known at or soon after 1 July 2013. Because of large employer funds, it is not likely that the full list of existing funds authorized to offer a MySuper product will be known until late 2013 or early 2014.
52. The other significant Stronger Super development which may be relevant is SuperStream. For employers change of default fund, and better information to assist new default selection, should become easier as SuperStream embeds. Perhaps more importantly information reported by funds is to change somewhat and should be available a little closer to real time. Funds trustees may also need time to acclimatize to their new duties, including those proposed by the Commission's recommended framework.
53. The Draft Report also proposes that modern awards identify both the fund and its identifying number. Funds are currently prescribed in awards by name, and very rarely anything more.
54. ACCI does not necessarily oppose the inclusion of a fund identifying number, but it is concerned to make sure that both the transition to default contributions being made into funds offering MySuper products is as easy as possible, and also to avoid the creation of requirements providing additional points for technical breach.
55. The ideal outcome is that an employer making default contributions into a fund which becomes authorized to offer MySuper would notice no difference from 1 October 2013, and that is the goal that should be pursued. So far as possible the investment option selected by the member or imposed by the trustee should be linked to the member's number with the fund, employers should not be required to alter contribution information to reflect member investment decisions (or non-decisions).

Who should assess applicant funds for inclusion into modern awards?

56. The Commission's preferred options are based on the idea that if modern awards are to nominate funds the selection of those funds should reflect the interests of those covered by the award. So the argument goes, identifying the appropriate funds should not be left to the industrial parties, nor past practice which is itself a legacy of the industrial parties.
57. While ACCI remains unconvinced that the case for secondary regulation of superannuation through modern awards has been properly made out, it

accepts that the context proposed by the Commission's preferred options is a significant departure from the past. Both the Commission's preferred options envisage independent qualified panelists who would assess the applicant funds, and in both cases the funds themselves would apply for award nomination.

58. To some extent the Commission's preferred options "second guess" APRA's authorization process because they suggest that although a fund qualifies to offer a MySuper product it does not reach the standard required for award inclusion. Inclusion in an award is in itself a significant market advantage, and exclusion from all awards, a disadvantage.
59. When selection of funds nominated in awards is no longer "industrial" the market disadvantage of exclusion from the award system could be expected to increase. This means that every effort needs be made to sustain credible channeled competition but it is not a reason to continue the practice of industrial parties nominating funds in awards.
60. The Commission's options also raise the issue of data which is needed for the assessments to take place. Looking at data collection at the first instance (rather than data imported for subsequent usage) clearly APRA is the regulator which continuously receives relevant data from funds, to a lesser extent the ATO does, with a mix of fund and member data, and ABS is the most likely source at first instance for demographic data. ABS data collection may need to be modified to better support relevant demographic information. While FWA controls the coverage of modern awards, it does not have a significant data collection capacity for the type of material required for fund capacity assessment.
61. A second reason for seeking panel input from the regulators and ABS is that fund applications should not require them to expend significant resources, or replicate what is available elsewhere. Neither employer nor member interests are served by imposing unwarranted new significant costs on the funds.
62. Assessing financial capacity and anticipating future performance will require judgment from the panel and it is difficult to wholly remove conflicted interest or personal bias from this activity. Accurate data can help with these problems if not wholly solve them. Distancing from obvious areas of interest is another.
63. Were the Commission to remain of the view that it should recommend one of the preferred options in the Draft Report, ACCI would prefer that the Commission develop its final recommendations on the basis of option 4. This is not a strongly held preference and it is not expressed with the intention of opposing option 3. Separating the decision making panel from the normal processes of award-making may assist to reduce the likelihood of conflict of interest, make clearer the changed basis of selection and to assist in having

the assessment being seen as independent from industrial interests. In ACCI's view, provided the mechanism is transparent and objective, fosters channeled competition, and the criteria for assessment are properly directed, the extent to which FWA is part of the process is part of the assessment process is not a major issue.

64. To avoid doubt ACCI also reiterates its view that nominating superannuation funds should not be subject to the Fair Work Act's existing provisions for award review and award variation and that these are inconsistent with the Commission's proposals.

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www.retail.org.au

AUSTRALIAN SELF MEDICATION INDUSTRY (ASMI)

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

BUS INDUSTRY CONFEDERATION

LEVEL 2, 14-16 BRISBANE AVENUE
BARTON ACT 2600
T: 02 6247 5990
F: 02 6230 6898
E: enquiries@bic.asn.au
www.bic.asn.au

CONSULT AUSTRALIA

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SYDNEY NSW 2000
T: 02 9922 4711
F: 02 9957 2484
E: info@consultaaustralia.com.au
www.consultaaustralia.com.au

HOUSING INDUSTRY ASSOCIATION

79 CONSTITUTION AVENUE,
CAMPBELL ACT 2612
T: 02 6245 1300
F: 02 6257 5658
E: enquiry@hia.com.au
www.hia.com.au

LIVE PERFORMANCE AUSTRALIA

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15-17 QUEEN STREET
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T: 03 9614 1111
F: 03 9614 1166
E: info@liveperformance.com.au
www.liveperformance.com.au

MASTER BUILDERS AUSTRALIA LTD

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F: 02 6202 8877
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MASTER PLUMBERS' & MECHANICAL SERVICES ASSOCIATION OF AUSTRALIA (THE)

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

NATIONAL BAKING INDUSTRY ASSOCIATION

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

NATIONAL ELECTRICAL & COMMUNICATIONS ASSOCIATION

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

NATIONAL FIRE INDUSTRY ASSOCIATION

PO BOX 2466
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T: 03 9865 8611
F: 03 9865 8615
E: info@nfia.com.au
www.nfia.com.au

NATIONAL RETAIL ASSOCIATION

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COORPAROO DC QLD 4006
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F: 07 3240 0130
E: info@nra.net.au
www.nra.net.au

OIL INDUSTRY INDUSTRIAL ASSOCIATION

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PHARMACY GUILD OF AUSTRALIA

LEVEL 2, 15 NATIONAL CIRCUIT
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F: 02 6270 1800
E: guild.nat@guild.org.au
www.guild.org.au

PLASTICS & CHEMICALS INDUSTRIES ASSOCIATION

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

PRINTING INDUSTRIES ASSOCIATION OF AUSTRALIA

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

RESTAURANT & CATERING AUSTRALIA

SUITE 17, 401 PACIFIC HIGHWAY
ARTARMON NSW 2064

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

VICTORIAN AUTOMOBILE CHAMBER OF COMMERCE

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