

5 June 2008

Commissioners Fitzgerald and McRae  
Paid maternity, paternity and parental leave inquiry  
Productivity Commission  
GPO Box 1428  
CANBERRA CITY ACT 2601

Dear Commissioners

The National Farmers' Federation (NFF) seeks to provide a brief submission to the Productivity Commission Paid maternity, paternity and parental leave inquiry.

The NFF position is as follows:

- The current workplace relations minimum requirement as to unpaid parental leave is appropriate.
- The NFF supports the key social objectives sought as to the health and welfare of the mother and child and population growth, but believes universal regulated paid parental leave (maternal and/or paternal) is not the appropriate mechanism as it is by definition restricted to employed women.
- The concept of a government or compulsory employer paid parental leave scheme discriminates against women who do not work, those who are self-employed or those who work in family businesses but are not deemed employees, for example, women farmers.
- Business should not be legally required to provide paid parental leave or be forced to "top up" any government paid parental leave scheme. For small business in particular, the cost implications without the offset of necessary productivity improvements far outweigh the benefit of a compulsory paid scheme.
- Paid parental leave as a workplace entitlement should only be implemented at individual workplaces through workplace agreements or common law contracts where there is a benefit to both the employer and employee through the arrangement.
- Existing social assistance measures should instead be reviewed to determine whether these are adequate to effectively pursue family and population policies on a more fair and equitable basis than a government paid parental leave scheme or a compulsory employer paid parental leave scheme.

It is noted that the baby bonus is a universal social assistance measure although will be restricted through a means test as of 1 January 2009. The baby bonus is available regardless of employment status. The baby bonus concept is consistent with the NFF position that social assistance measures to assist families during the time of birth and immediately after are available to all as opposed to just employed persons.

The NFF awaits with interest the release of the draft report.

Yours sincerely



(MRS) DENITA WAWN

General Manager – Workplace & Corporate Relations