



AUSTRALIAN CHAMBER OF
COMMERCE AND INDUSTRY



Submission to
Agricultural
Competitiveness
Green Paper

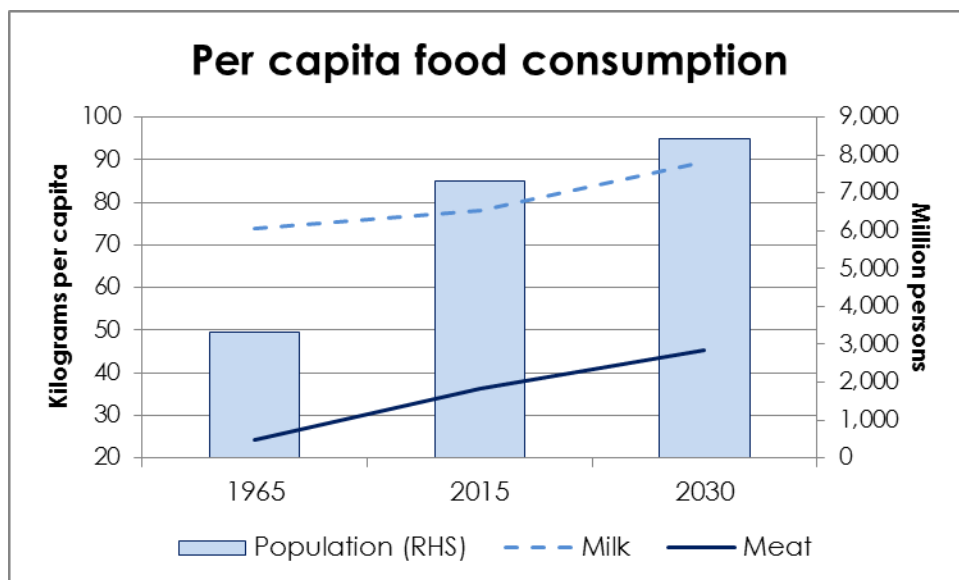
December 2014

EXECUTIVE SUMMARY

We welcome the Agricultural Competitiveness Green paper and many of the suggestions within. It is important to note that a number of competitiveness issues in the agricultural sector are not unique to that sector alone and much of the discussion in the paper relates to issues that affect business across the entire economy.

As shown in Figure 1 and Table 1 below, demand for food is projected to grow strongly, driven by increases in both global population and per capita food consumption. For Australia to capitalise on the opportunities presented by these dynamics, we need to ensure that our capacity to meet the growing demand is supported with high quality research and development, farming systems and business practices.

Figure 1:



Sources: World Health Organisation. (2014). "Global and regional food consumption patterns and trends" http://www.who.int/nutrition/topics/3_foodconsumption/en/print.html. and GeoHive: Global Population Statistics. "Population of the entire world, yearly, 1950 – 2100." <http://www.geohive.com/earth/history3.aspx>; ACCI calculations.

Table 1:

Projected total global consumption of red meat and dairy products			
	2015	2030	% change
Total meat (tonnes)	266,622,073	381,649,668	43%
Total milk – (tonnes)	572,065,492	754,031,904	32%

However, the rest of the world is also aware of these facts and opportunities. Australia is not alone in trying to capture these opportunities. We must increase our competitiveness by reducing costs within the Australian economy and developing internationally focussed businesses.

For that reason we urge the Government and stakeholders to merge the efforts to improve competitiveness for agriculture into the wider Industry, Innovation and

Competitiveness Agenda, the major policy review processes currently underway or due to commence shortly, namely, the Competition Policy Review (Harper Review), the Financial System Inquiry (Murray Review) and the three White Paper processes on Energy, Reform of the Federation and Taxation. Similarly there are also existing reviews and initiatives related to national harmonisation of occupational licencing and work health and safety which would be the most appropriate place to consider common issues.

That said agriculture is one of Australia's most important and enduring export industries and we need ensure that Australia maintains a viable agricultural sector. In this context it is important to separate appropriate economic policy to assist competitiveness from the social arguments expressed by some stakeholders in respect to maintaining family farms and the wider communities in regional Australia. The viability of agricultural production and the best and most efficient business model will not be found through the advocacy of one model over another. Farming businesses, much like all businesses needs to be flexible and innovative to suit changing circumstances.

Policies that are designed to maintain particular preferences will result in lower competitiveness and lower national welfare and so Government must resist calls to preference any particular model for successful agricultural operations and or specialised support or taxation arrangements for the agricultural sector beyond that of business in general. The appropriate approach is to continue to reduce red tape and other areas of unnecessary costs of regulations and inefficient operations, Government and private sector, to ensure that our costs base is as low as possible to give all of our industries and entrepreneurs the best chance of success in the global marketplace.

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is the leading voice of business in Australia**

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1. INFRASTRUCTURE

1.1 Policy idea 1—Building new transport infrastructure:

ACCI recognises the importance of effective and efficient transport infrastructure and the investments Governments across Australia are making to improve these systems. Major intermodal developments offer potentially improved system efficiencies, however these are often mired in local and regional interest debates which constrain the ability for such developments to move ahead.

For example the second airport at Sydney has been delayed for many years over issues to do with sighting and in fact arguments over the need for such as development if the current Sydney airport could be operated around the clock.

The Western Sydney intermodal site has also been hampered by unresolved commercial and competitive issues until recently.

Canberra Airport has been championed as a possible opportunity for development of a regional passenger and freight airport with direct international flights.

The inland rail systems of eastern Australia continue to run down as we debate the merits of improved passenger and freight rail connecting our major cities and rural areas.

Government must be explicit with nationally important infrastructure improvements and then once settled stick to the plans. Uncertainty and sovereign risk associated with politically motivated decision processes are unhelpful to the long term development of our nation's infrastructure needs.

1.2 Policy idea 2—Improving existing infrastructure and transport regulation:

It is important that the emphasis not only be on new infrastructure but also improving existing infrastructure and its operations. Recently, the Chamber of Commerce in Western Australia engaged NICTA (National ICT Australia) to undertake an analysis of the opportunities from the development of a "Port Community System" (PCS) this report found that significant efficiencies could be gained if the port user community were able to improve their operation of the existing port infrastructure.

Similarly current road and rail systems often have significant speed, weight and height restrictions which mean that it is difficult to transport loads as efficiently as they could be between production and consumption points. Related to this are operational constraints associated with our industrial relations system and environmental constraints pertaining to noise and other community disturbances. We need to find ways to overcome such constraints otherwise they will remain as inherent drags on system efficiency.

The new trade agreements with China, Japan and Korea offer new investment opportunities and some flexibility for workforces engaged in major projects and these could be operationalised to assist to deploy world's best transport networks at lower cost and deployment times than the current case.

Similarly recent changes to cabotage laws and the operations of foreign ships and crews will improve competitive within Australia generally, not only for the agricultural sector.

The last review into Part Ten (X), International Shipping Cargo Liner was conducted by the Productivity Commission in 2005¹, when the provision was still under the Trade Practices Act. The review found that the greatest anti-competitive risk related to agreements that fix prices and control the supply of shipping to a trade route.

ACCI recommends that Part Ten (X) of the CCA should be repealed on the basis it predicates anti-competitive conduct amongst international liner cargo shipping.

1.3 Policy idea 3—Enhancing communications:

Communications infrastructure is essential for engagement in a digitally capable world. Many new opportunities arise when rural and regionally based communities can access global markets and information from their previous remote locations. Coupled to appropriate physical transport infrastructure it is possible for people in these regions to deliver goods and services to international customers in ways never previously envisaged.

Conversely, it also enables transformational technology such as 3-D printing to be deployed in these areas which has the possibility of dramatically reducing costs for components or parts through to entire buildings across regional Australia. Fast and efficient communications networks are essential to ensuring regional Australia can fully grasp the opportunities on offer. Much the same as other infrastructure however, the costs of deploying capital intensive options with fixed lines and capacity needs to be fully contemplated and appropriate transparent public investment models as suggested by the Productivity Commission and its predecessor body the Bureau of Industry Economics since the mid 1990's, applied.

¹ Australian Government Productivity Commission (2005). Review of Part X of the Trade Practices Act 1974: International Liner Cargo Shipping. *Inquiry Report*. No. 32.

If Governments decide that regional services are a priority and are deserving of Government support, then subsidies need to be delivered in a transparent and efficient manner. ACCI supports the use of explicit community service obligations and transfer payments between the general government sector (GGS) and public non-financial corporations (PNFCs) or the private sector. This enables all stakeholders to be fully informed about the costs involved in delivering such services.

ACCI opposes cross-subsidisation within PNFCs. It is an opaque means of delivering these services. Cross-subsidies necessitate the creation and exercise of a degree of market power which creates poor incentives for efficiency and hampers competitive neutrality. This in turn, lowers overall social welfare and harms competitiveness.

2. WORKING WITH THE STATES AND TERRITORIES

2.1 Policy idea 4—State government deregulation:

ACCI supports the stakeholders suggestions for deregulation including:

- a. removing excessive native vegetation laws;*
- b. removing excessive work health and safety requirements; and*
- c. improving the efficiency of the native title system.*

We would also add to this list the need to improve:

- streamlining and harmonising of occupational licencing through existing national licencing initiatives
- recognition of work health and safety legislation improvements through the existing harmonisation processes of Safe Work Australia.

2.2 Policy idea 5—Protecting the resource base:

ACCI supports the stakeholder suggestions regarding to:

- b. providing opportunities for farmers to convert leasehold land into freehold;*
- c. ensuring greater consistency in biosecurity regulations between Australian jurisdictions;*

However we are not supportive of suggestions related to limiting competition between industries related to controls on the mining sector.

- a. limiting the adverse impacts of mining on the agriculture sector, including by providing a royalty stream for land holders affected by mining, ensuring that access to freehold land is granted with the agreement of the landowner and ensuring that no long-term damage is done to aquifers so as to change the agricultural capacity of the district as a result of extraction activities;*
- d. Quarantining prime agricultural land from mining.*

It is important for national welfare that the highest value use is assigned to our limited resources. Competing uses should not be regulated in a way that preferences one use over another. Where mixed use is possible this should be encouraged and issues over land and water access should be resolved through voluntary commercial means.

In areas where one use will place constraints on another use then appropriate use conditions should be applied by the planning and regulatory authorities to ensure that the enjoyment of each of the users can be maintained. This process should be transparent and known to all stakeholders.

2.3 Policy idea 6—Strengthening farm businesses:

Apart from the idea of subsidising any given action, ACCI supports the ideas proposed in general but we note that these issues apply to businesses more broadly. These are not unique issues for the agricultural sector:

- a. *implementing a nationally consistent and mandatory approach to farm debt mediation;*
- b. *subsidising farm energy audits;*
- c. *streamlining development application processes by assigning a single government official to assist a farm business as they work through the different steps;*
- d. *enforcing animal welfare legislation and strengthening laws to stop trespass on farms; and*
- e. *adopting the Co-operatives National Law to make it easier to run a cooperative across different states.*

3. COMPETITION AND REGULATION

3.1 Policy idea 7—Improving market competition:

While we appreciate that some participants in agricultural supply chains may feel that improvements could be made in transparency within the supply chain, ACCI does not support mandatory approaches. Many primary products are globally traded on international markets which have a high degree of transparency and visibility of forward prices. The fact that these change on a frequent basis and can be high at certain points during the cycle and low at others is not a case for Government interference in the market, nor to improve information asymmetry.

If there are issues with farmers not understanding these markets then there may be a case for assisting to improve the skills and literacy of farmers in how to use the available information and tools.

A lot of information is held and disseminated by official Government sources which is generally made available to the market free of charge. However, other stakeholders may be able to provide improved and more timely information based on their own assessments which is available to the market on a fee basis.

Farmers should not expect that the marketplace should provide them with perfect knowledge free of charge. This is unattainable.

Some of the discussion on this topic appears to relate to issues with domestic primary and retail markets. Farmers are participants in supply chains from producer to consumer and it is essential that each of the levels in this chain are viable and successful. Mandating disclosure of commercially sensitive information would not be supported by ACCI, however participants should be encouraged to have open book policies to inform upstream and downstream participants of their needs and situations to ensure that consumers are appropriately serviced with quality food and fibre. Ultimately, the entire supply chain needs to focus on providing greater value to consumers in both the domestic and export markets.

In terms of encouraging the use of cooperatives, ACCI is not aware of any particular restrictions on farmers developing and using cooperative structures.

3.2 Policy idea 8—Strengthening competition laws:

We note that the Government’s Competition Policy Review is examining these issues for the whole economy and so there is no need for special consideration of the agricultural sector.

We support the view that competition policy is focussed on preventing rent seeking and removing constraints on trade. It is not about protecting some stakeholders from other stakeholders.

3.3 Policy idea 9—Improved regulation:

ACCI supports the removal of unnecessary red and green tape and ensuring that necessary regulation is effective and implemented in a least cost manner.

ACCI supports the recognition of international product registrations within the Australian economy to reduce the costs of product entry where there is no risk to the Australian environment or ecosystem.

On the issue of Country of Origin labelling, in concert with our member, the Australian Food and Grocery Council, we have participated in industry forums on this topic. ACCI is an authorised body for the issuance of “certificates of origin” for Australian product entering the international marketplace and in compliance with certain FTA requirements.

ACCI supports the concept of “last substantial transformation” which has become the accepted test for statements concerning the origin of goods in the international marketplace.

We believe that if goods can be sold in the international marketplace as “Australian Origin” then these should be the defining rules and system for the domestic purpose also. It has become evident that there are “origin” issues across the four layers of administration of such systems – international, national, state and even local jurisdictions – and that there are significant opportunities to streamline and harmonise the “red tape” on this issue.

ACCI is a founding member of the Australian Made, Australian grown Campaign and we support the use of this initiative and its registered and trademarked logo systems in support of identification of “Australian” products. We recommend that the Government endorse this campaign as THE brand Australia symbol. There is also a clear role for the Australian Government in coordinating jurisdictional and industry promotion efforts, and developing an underpinning set of messages that can be used by all parties.

With reference to the international marketplace and FTA rules of origin compliance, we continue to urge the Government to adopt a single system for “third party certified” Australian origin to assist to reduce costs and risk for Australian exporters in the international market place. ACCI would be pleased to work with the various agencies to assist with the understanding of these issues.

4. FINANCE, BUSINESS STRUCTURES AND TAXATION

Many of the issues raised under this section are not unique to the agricultural sector and so need to be considered within the context of the wider inquiries on Australia’s financial system and the upcoming White Paper on the Reform of Australia’s Tax System and the Federation White Paper in 2015.

4.1 Policy idea 10—Improving access to finance:

ACCI is concerned about the focus of the stakeholder suggestions of the permanent requirement for concessional financing arrangements and taxation advantages to underpin a viable agricultural industry. There should be no need for long term structural support for the industry or any level of preferential investment incentives. Such approaches risk creating distortions in the investment market that will not improve Australia’s national welfare.

ACCI does not believe there is any role for Government to intervene in improving access to finance to agriculture beyond the overall efforts for business in general. It is also

intriguing that on one hand stakeholders are calling for improved financial offerings and on the other supporting restrictions to foreign investment which offers alternative finance to traditional banks. Financial product innovation will be driven by increasing competition in the banking sector rather than special treatment of the agricultural sector.

4.2 Policy idea 11—Improving tax system efficiency and equity:

ACCI agrees that taxation policy changes should be considered in the context of the Government's Tax White Paper. We are opposed to preferential treatment of the agricultural sector under the taxation regime if this preference is to encourage investment. Such approaches risk distortions in the investment market. Taxation needs to apply equally to businesses across Australia in a consistent manner. Notwithstanding this however, we support simplification of the tax system for all businesses in Australia.

Current depreciation arrangements in Australia's taxation system are complex and uncertain due to different arrangements for different assets and special or preferential treatment. For example, currently there are 40 different effective lives provided for 3,700 assets; while low value assets (with a value of \$1,000 or less) can be pooled together and depreciated at 37.5 per cent per year.

ACCI supports the Henry Review's recommendation to increase the threshold for assets that small businesses can immediately write-off to \$10,000 in the income year the asset is first used or installed ready for use. This measure will provide cash flow benefits for the small business sector and simplify their capital allowance arrangements.

4.3 Policy idea 12—Farm business improvement:

We were unable to understand the rationale for this idea. Advisory services are well established across Australia and increasingly such services are offering online and over the phone services which provide greater access to Australians in regional areas. We would not support a special approach to the agricultural sector.

In terms of the suggestion for expanding or extending the Entrepreneurs Infrastructure Program, this may have merit however as the scheme is not yet fully operational it should be allowed to operate for a time under the current plan and its success analysed before any modifications are introduced.

5. FOREIGN INVESTMENT

5.1 Policy idea 13—Improving the transparency of foreign investment:

While it is important that the Government and Industry understands the profile of ownership and investment in Australian businesses there is no case for a special approach to the agribusiness sector that does not generally apply to all business.

It is difficult to rationalise the arguments within the Green Paper for greater access to finance for the rural sector and then the maintenance of constraints on investment and sectoral thresholds for the application of the Foreign Investment Review Board assessment.

ACCIs view is that the operations of the FIRB should be consistent across the entire economy and not subject to preferential arrangements for either foreign private investors, or the type of investments within Australia. That said, we are not opposed to the concept that State Owned Enterprises should be restricted and monitored with closer scrutiny than investors from the general private sector.

6. EDUCATION, SKILLS AND TRAINING, AND LABOUR

6.1 Policy idea 15—Strengthening labour availability:

In relation to suggestions about Relocation Assistance to Take up a Job – these programs have traditionally not attracted substantial numbers of applicants. Remote location tax incentives would be a better option. We included the following in a submission to a Senate inquiry into labour mobility last year:

The taxation system, at both a federal and state level can be manipulated to boost mobility. The removal of Stamp Duty by State Governments would serve to remove a significant cost barrier to individuals relocating. The personal income tax system can also be used to encourage people to move to areas of labour shortages. While there does currently exist an income tax allowance for people living in away from home in the form of the Living Away from Home Allowance (LAHFA), further research is needed into the most appropriate way to use the tax system to encourage increased labour mobility between states.

If it is deemed that the current LAHFA is the most appropriate method, the value of the State based wages zone rebate based on geographic isolation

needs also to be reviewed, so that it provides a meaningful incentive to relocate. Since the introduction of the rebate, its value has been eroded by the strong growth in the economy and wages.

Changes are required to improve the application of the Temporary Skilled Migration Income Threshold (TSMIT) as this proves a major barrier for employers in applying, especially in outer urban and regional areas. TSMIT (set at \$53 000) is above market rates for mid-range skilled workers in the agricultural sector. A more flexible approach linked to market rates at a regional level would ease eligibility restrictions and increase access to many regional employers.

The inclusion of Fiji in the Seasonal Workers Program will give employers in the production horticulture sector increased access to Pacific Island workers. Fiji has a stronger skills base than other Pacific Islands and interest in the program is already at high level in Fiji only weeks after the announcement of their inclusion. We also note that international bodies have reported that if Australia were to increase its intake of seasonal workers on a per capita basis to match that of New Zealand, then the flow on benefits to the source countries would far exceed Australia's aid expenditure in the Pacific region.

In 2011, ACCI was the managing partner in the Business Partnership Group (BPG) for the Indonesia Australia Comprehensive Economic Partnership Agreement (A-CEPA) negotiations. As a component of the BPG report, we recommended a pilot project called the *Skills Exchange* pilot. This recommends an improved system to allowing entry into both countries of citizens who can work and become trained or share knowledge and skills between our two economies. We urge the Government to continue to pursue this project and include agricultural related business and skills within the pilot.

7. DROUGHT

7.1 Policy idea 16—Increasing drought preparedness:

The potential for adverse climate change to impact on Australian farming businesses has been discussed in the media and by industries for many years and so farming businesses should be considering the potential for adverse impacts and planning accordingly. Tools for understanding climate and seasonal weather patterns are available and improving. We would support continued R&D efforts so that appropriate decision making tools are available to rural communities to assist with understanding weather and considering adaptation to potential climate change.

A wide variety of insurance products are offered within the Australian marketplace. We do not see a role for Government in development or offering of insurance products outside of the range currently available. In relation to State Government stamp duties however, these are some of the least efficient taxes in Australia and we would support their consideration under the wider taxation review in 2015.

Suggestions on other taxation related incentives should be considered within the Tax White Paper in 2015.

7.2 Policy idea 17—In drought support:

ACCI does not have an explicit drought policy, however, we are of the view that business should not expect to receive Government support in order to maintain viable business and industries. Drought is a common and known feature of the Australian landscape and businesses that are reliant on nature need to understand the risks involved. It is essential that discussion about fostering a competitive agricultural sector is not confused with social issues concerning the maintenance of rural and regional communities. The latter may well be an important issue but the two should be separated in terms of policy development.

Support systems that maintain unviable farming businesses can distort the investment market and retain unviable business operations and act as a disincentive for new business entrants or the expansion of other viable businesses. Market forces must be allowed to shape the future of our competitive agricultural sector.

We appreciate that financial hardship for any reason can have significant impacts on the emotional state of those involved, and their communities, and so we do understand the need for appropriate assistance to ensure that the transition of people out of farming is managed in a way that supports the needs of those within the exit phase.

8. ACCESSING INTERNATIONAL MARKETS

8.1 Policy idea 24—Strengthening Australia's overseas market efforts:

ACCI is a founding member of the Australian Made, Australian grown Campaign and we support the use of this initiative and its registered and trademarked logo systems in support of identification of “Australian” products. We recommend that the Government endorse this campaign as THE brand Australia symbol. There is also a clear role for the Australian Government in coordinating jurisdictional and industry promotion efforts, and developing an underpinning set of messages that can be used by all parties.

ACCI and our members provide a wide range of support services for existing and impending exporters. These services include technical products of international model contracts, dispute resolution services, understanding of trade terminology and international trade finance.

We have developed an online service through the website www.australaintradelinks.com.au to assist Australian firms engaged in international trade to better understand the markets, the border crossing procedures, implication and requirement of FTAs, assess their export readiness and participate in connecting with

international supply chains. We would be pleased to work with the Government to improve delivery of our services to the agricultural community and exporters.

8.2 Policy idea 25—Improving Australia's export and import systems:

ACCI supports the Government's efforts to liberalise trade and investment with our major trading partners. These efforts though need to be harmonised to provide business with improved ease of compliance with the currently complex compliance arrangements for each separate agreement. ACCI has advocated that Australian negotiators need to insist upon the application of the World Customs Organisations 2006 Kyoto Agreement on Harmonisation and Simplification of Customs Procedures.

We also welcomed the finalisation of the WTO "Bali package" and we encourage the Australian Government to implement the required legislation and measures at our border, as well as assisting our major trading partners and other markets of interest in our region to implement this package as soon as possible.

With reference to the international marketplace and FTA rules of origin compliance, we continue to urge the Government to adopt a single system for "third party certified" Australian origin to assist to reduce costs and risk for Australian exporters in the international market place. ACCI would be pleased to work with the various agencies to assist with the understanding of these issues.

This system of third party certification services provides a more efficient and effective approach and could be extended to other certification needs where Chambers of Commerce could provide the on ground support to streamline and reduce costs for business rather than continued departmental issuance where this is still the case.

9. ABOUT ACCI

9.1 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 eight state and territory chambers of commerce
- 29 national industry associations
- Bilateral and multilateral business organisations.

In this way, ACCI provides leadership for more than 300,000 businesses which:

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

9.2 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 the Fair Work Commission, 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.

ACCI MEMBERS

ACCI CHAMBER MEMBERS: ACT AND REGION CHAMBER OF COMMERCE & INDUSTRY **BUSINESS SA** CHAMBER OF COMMERCE NORTHERN TERRITORY **CHAMBER OF COMMERCE & INDUSTRY QUEENSLAND** CHAMBER OF COMMERCE & INDUSTRY WESTERN AUSTRALIA **NEW SOUTH WALES BUSINESS CHAMBER** TASMANIAN CHAMBER OF COMMERCE & INDUSTRY **VICTORIAN EMPLOYERS' CHAMBER OF COMMERCE & INDUSTRY** **ACCI MEMBER NATIONAL INDUSTRY ASSOCIATIONS:** ACCORD – HYGIENE, COSMETIC AND SPECIALTY PRODUCTS INDUSTRY **AIR CONDITIONING & MECHANICAL CONTRACTORS' ASSOCIATION** AUSTRALIAN BEVERAGES COUNCIL **AUSTRALIAN DENTAL INDUSTRY ASSOCIATION** AUSTRALIAN FEDERATION OF EMPLOYERS & INDUSTRIES **AUSTRALIAN FOOD & GROCERY COUNCIL ASSOCIATION** AUSTRALIAN HOTELS ASSOCIATION **AUSTRALIAN INTERNATIONAL AIRLINES OPERATIONS GROUP** AUSTRALIAN MADE CAMPAIGN LIMITED **AUSTRALIAN MINES & METALS ASSOCIATION** AUSTRALIAN PAINT MANUFACTURERS' FEDERATION **AUSTRALIAN RETAILERS' ASSOCIATION** AUSTRALIAN SELF MEDICATION INDUSTRY **BUS INDUSTRY CONFEDERATION** CONSULT AUSTRALIA **HOUSING INDUSTRY ASSOCIATION** LIVE PERFORMANCE AUSTRALIA **MASTER BUILDERS AUSTRALIA** MASTER PLUMBERS' & MECHANICAL SERVICES ASSOCIATION OF AUSTRALIA (THE) **NATIONAL BAKING INDUSTRY ASSOCIATION** NATIONAL ELECTRICAL & COMMUNICATIONS ASSOCIATION **NATIONAL FIRE INDUSTRY ASSOCIATION** NATIONAL RETAIL ASSOCIATION **OIL INDUSTRY INDUSTRIAL ASSOCIATION** PHARMACY GUILD OF AUSTRALIA **PLASTICS & CHEMICALS INDUSTRIES ASSOCIATION** PRINTING INDUSTRIES ASSOCIATION OF AUSTRALIA **RESTAURANT & CATERING AUSTRALIA** VICTORIAN AUTOMOBILE CHAMBER OF COMMERCE