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ACCI Submission to the Productivity Commission Inquiry into Australia's Maritime Logistics System

April 2022



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1 Introduction

The Australian Chamber of Commerce and Industry (henceforth ACCI) welcome the opportunity to provide input to the Productivity Commission's inquiry into Australia's maritime logistics system. ACCI represents a diverse network of businesses, industry associations, and state and territory chambers of commerce, providing a broad and unique perspective.

The COVID-19 pandemic has shone a light on all aspects of the supply chain including maritime logistics. The Australian economy is strongly anchored in trade, so we need to ensure the port systems through which products are imported and exported are efficient, effective, and contemporary.

Addressing all terms of reference in this inquiry, this submission will explore current challenges in port performance, productivity growth, and industrial relations. This submission also provides commentary on developing the future of maritime logistics in Australia with efficiency gains through competition, innovation, infrastructure, benchmarking and regulation.

ACCI makes the following recommendations:

Recommendation 1: Publish and Improve Port Performance

Continue to investigate and publish data on the performance of Australian ports and pursue initiatives to improve benchmarking outcomes

Recommendation 2: Monitor Economic Impact

Monitor developments in supply chains and maritime logistics. Ensure transparent fee setting practices and maintain oversight of flow through to consumer prices.

Recommendation 3: Future of Maritime Work Research / Strategy

Industry participants should be invited by the appropriate Minister to come together as a 'Ministerial Taskforce on the Future of Work in the Maritime Industry'

Recommendation 4: National Maritime Skills Strategy / Roadmap

In parallel with, or as part of, the strategic approach to workforce planning within the new Skills cluster framework, industry participants (employers and unions) should be convened to develop a Roadmap of future skills needs, including specialist and general vocational skills, and practical tools for future job (re)design (able to be applied at the workplace or enterprise level).

Recommendation 5: National Maritime Industry Diversity Strategy / Priorities

The AHRC, through its Sex and Race Discrimination Commissioners should, following input from employers and unions, be jointly tasked with inquiring into, and making recommendations on, measures to support greater diversity in maritime industry workplaces.

Recommendation 6: Advance Recommendation 20.2 of the 2015 inquiry into Australia's workplace relations framework.

The Commission should recall and again advance Recommendation 20.2 of its 2015 inquiry into Australia's workplace relations framework.

Recommendation 7: Benchmark Enterprise Agreements for the Maritime Sector

Research or benchmarking should be undertaken comparing enterprise agreements for the maritime sector to comparable enterprise agreements in other sectors of the economy.

Recommendation 8: Ban Family and Friends Union Preference Clauses

'Family and Friends' style union preference clauses, such as that agreed between Hutchison Ports and the MUA should not be able to be included in any future agreements approved under the Fair Work Act, nor to be able to be advanced as claims that can give rise to legally protected industrial action.

Recommendation 9: Increase Competition

Increase competition in the maritime port system to provide more choice in the sector and achieve efficiency gains.

Recommendation 10: Pursue Innovation and Best Practice

Pursue an innovative maritime logistics system with forward planning, transparency, and goal-driven global benchmarking. Make the most of current issues to advance supply chain digitalisation and simplify trade.

Recommendation 11: Review Benchmarking and Data

There should be a regular flow of information / publication on the performance and productivity of the Australian maritime sector, and in particular the performance of our ports.

Recommendation 12: Invest in Infrastructure for the Future of Maritime Logistics

Support the development of deepwater terminal services and investment to expand and grow port-rail capabilities. Australia's port and transport infrastructure should be developed to support future needs.

Recommendation 13: Create a Fair and Conducive Regulatory Environment

Regulate maritime logistics through the ACCC to create a fair and competitive system which promotes Australia as an attractive shipping market. Implement recommendations from the ACCC *Container Stevedoring Monitoring Report 2020-21*.

2 Australia's Maritime Logistics System

2.1 Port Performance

The long-term trends and structural changes of the maritime logistics system are closely monitored by the Australian Competition and Consumer Commission (ACCC), which has been tracking the prices, costs, and profits of stevedores at the international container ports in Adelaide, Brisbane, Fremantle, Melbourne and Sydney for the past 23 years.

The ACCC's recently released *Container Stevedoring Monitoring Report 2020-21* details the long-term trends, structural changes and impediments that impact on the efficiency and dependability of the maritime logistics system in Australia.

Key long-term trends and structural changes highlighted in the report include:

- Containerised freight has expanded substantially over the past 40 years, becoming the dominant form of international shipping, and greatly reducing the cost of transporting goods.
- Annual throughput at international container ports in Australia has grown three-fold over the past 20 years.
- The long-term duopoly in Australian ports of DP World and Patrick has been diluted over the past 8 years by the entry of Hutchison (Brisbane and Sydney) and VICT (Melbourne). This has increased competition in these east coast ports, reducing operating margins and driving a substantial increase in infrastructure investment - Hutchinson (\$600 million in Brisbane and Sydney), Patrick (\$700 million to semi-automate terminal in Port Botany), DP World (\$300 million to semi-automate terminal in Brisbane) and VICT (\$550 million to start its fully automated operations at terminal in Melbourne).
- Yet this investment has not led to an improvement in productivity growth, which has fallen to one sixth the average of its 1999-2006 level in 2013-19 in TEU terms (down from 15.4% per annum to 2.5%), one quarter in labour terms (6.7% per annum to 1.5%) and one eighth in crane rate terms (5% per annum to 0.6%). This lack of productivity growth is contributing to increasing shipping costs to all Australian importers and exporters.
- Industrial relations issues were identified as one of the key reasons this investment, which has focused mainly on automation of port activities, have not led to increased efficiencies and productivity gains. Clauses within enterprise bargaining agreements limiting the ability of the stevedores to realise the full benefits of their investments.
- Increasing ship size is also creating challenges in Australian ports. Larger ships require deeper ports and giant cranes, limiting where they can go and placing greater demand on ports and terminal resources and reducing productivity. Significant (further) investment is required at Australian ports to support these larger vessels.
- The bigger ships are very expensive and more costly to operate, which has led the shipping companies to form alliances and cooperative agreements to share investment risk, reduce costs, optimise shipping capacity, and enable access to a broader number of markets. The top 10 shipping lines are grouped in three major alliances representing 80% of shipping capacity. This concentration of services has shifted greater power to the shippers in

negotiating with stevedores, container parks and cargo owners. This reduced competition is contributing to higher costs and the loss of some (less profitable) shipping routes.

Recent research by the Boston Consulting Group has shown that freight rates have increased between 200% and 300% compared to pre-COVID levels, driving all-time high profits for freight carriers. For freight between China and Melbourne, the BCG container price index increased 268% and bulk price index increased 50% between July 2019 and April 2021.

International benchmarking shows Australian ports are amongst the least efficient globally. World Bank/IHS Markit reporting shows the 5 majors container ports in Australia are in the bottom 30% of ports globally and 3 of the 5 are in the bottom 10%. Of the 351 ports assessed by the World Bank/IHS Markit, Brisbane was ranked 246, Melbourne 302, Fremantle 326, Sydney 337 and Adelaide 339.

As an example of the inefficiencies of Australian ports, the median in-port time in Australia at 1.2 days is 3 times longer than Japan, twice as long as China and 50% greater than Singapore and New Zealand.

Recommendation 1: Publish and Improve Port Performance

Continue to investigate and publish data on the performance of Australian ports and pursue initiatives to improve benchmarking outcomes.

2.2 Broad economic impact

COVID has exacerbated many of the challenges that have existed in Australian ports for decades, particularly the lack of competition due to industry consolidation and localised monopolies, and inefficient operations due to a lack of investment in productivity-improving infrastructure and industrial relations disputes.

United Nations Conference on Trade and Development (UNCTAD) calculations show a 3.8% contraction in global maritime trade in 2020 due to the shock of COVID-19, comparable to the contraction of 2009, due to the Global Financial Crisis. Like many global consumers, Australians are purchasing more imported consumer goods which is putting pressure on shipping capacity and causing congestion at Australian ports.

Longer at-port wait times due to increased traffic, as well as late arrivals and departures at earlier ports, is causing considerable disruption all along the supply chain. In addition, with trucking capacity tightening, landside transport rates are being driven up and manufactured goods ready for export are backing up in warehouses.

Shipping companies are responding to the port congestion by skipping port calls, cancelling planned sailings and moving cargo to later shipping line services. This is adding to delays for businesses, as it can be several weeks before a diverted ship returns to the Australian port.

Some stevedores have introduced count restrictions on crane movements to keep ships moving, which are further exacerbating delays. This is particularly impacting on bulk freight vessels that

take longer to unload. Some of these vessels are only half unloaded before they are moved on, only to re-join the end of the waiting queue to redock and complete unloading. Other ships are only part loaded before they are moved on, forcing exports onto later sailings, and contributing to underutilisation of export capacity. Uncertain ship docking also impacts import capacity with some ships moved on to an alternative port due to congestion generating additional costs. These costs are often unaccounted for and disruptive to supply chains and business relations. Businesses can be liable for these added costs under commercial arrangements, with costs then passed on to consumers.

UNCTAD reporting suggests import prices will increase by an average of 11% if container freight rates remain at current levels, leading to a global consumer price increase of 1.5% by 2023. These percentages are forecast to be significantly higher for small island developing states who depend on merchandise imports.

The surplus of empty containers at some ports is also adding to delays and increasing costs. As Australia is predominantly an importer of goods, a large stock excess of empty containers has built up at most major ports and container parks. Some carriers are refusing to take bookings until they can reduce the number of empty containers clogging the port, while others have introduced general rate increases and surcharges to de-hire empty containers, which is pushing up freight costs even further. There are also examples of exporter's shipments getting bumped so the shipping lines can pick up empty containers to transport goods on more profitable trade routes from China to Europe or the US.

There are no expectations of significant improvements in the situation in Australia or globally, any time soon. Omicron slowdowns are impairing already disrupted shipping schedules and contributing to further port congestion, with shipping conditions likely to remain challenging for importers and exporters throughout 2022.

With continuing uncertainties, disruptions, and high costs it will be increasingly important to monitor changes in the industry and ensure transparent practices when setting fees and surcharges. The flow through to consumer prices will also need to be regularly maintained.

Recommendation 2: Monitor Economic Impact

Monitor developments in supply chains and maritime logistics. Ensure transparent fee setting practices and maintain oversight of flow through to consumer prices.

3 Industrial Relations

'Work' significantly impacts the day-to-day running of our ports, the capacity of our maritime infrastructure to meet community, market, export and import demands, and the capacity of the industry to change and adapt.

Every industry relies on its people and on the effective management of people to deliver outcomes, and notwithstanding automation this seems particularly acute on our ports, where there are vivid

and visible reminders of the capacity of industrial action (threatened and realised) to stop imports and exports, and to seriously disrupt Australia's logistics chains.

3.1 Structural Shifts

ACCI is not presenting to the Commission as directly expert in the maritime sector, but rather from the perspective of users of the maritime logistics system and based on the fundamental importance of moving goods in and out of the country for entire economy and society.

How technologies are changing, fleet composition, ship sizes, shipping schedules, loading and crewing will come from others. We can however point to three 3 structural shifts which seem clear:

1. Automation and less labour intensive / heavy work

There seems to be an inevitability towards automation and technical change in the sector displacing heavy labouring style work with technological and stem skills, and the capacity to operate high technology but lower labour density style technologies. Automation is being actively pursued at a number of ports globally, and as an innovation in some Australian ports, making automation the inescapable way of the future.

As with preceding technological and structural shifts those who understand and strategically adapt to change will prosper, and those who deny inescapable change or seek to keep working as work has been traditionally undertaken will be less successful / at greater risk.

There seems a clear imperative for the Australian maritime industry to understand and strategically embrace technological change and automation. Planned transition seems to be in the best interests of both employers and employees in any industry that will be disrupted.

Trade unions securing concessions from employers to not introduce change or limit automation (for example) should not be confused with planned transitions to meet changing realities.

2. Heterogeneity of work

We understand there is something of an assumption towards generic maritime employment in Australia rather than specialisation. Whilst multi skilling and functional adaptability can be assets in other areas, specialisation seems set to play a more wide-ranging role in maritime employment. Practically, some people are going to sit in control rooms and high-tech cockpits, and different people are going to do heavy work such as lashing. It cannot be assumed every maritime employee has to be able to do both the heavy and the technical elements of the job.

Linked to automation, it seems clear that in Australia there will be increasing replacement of traditionally physically heavier and less skilled work with lighter and more technologically based work, and the substitution of capital / technology.

Such a substitution is not a business choice per se; it's the reality that employers are going to substitute potentially less safe, less competitive and less adaptable work if given the opportunity, and that contemporary generations of employees are also demanding different forms of work than

their predecessors. There may always remain an element of heavy and less skilled work on our docks, but one foreseeable shift has to be a reduction in the availability and sustainability of such work. Time will change the skilling and workforce profile of Australia's maritime industry, which can either be strategically embraced by unions and industry working together, or futilely denied and opposed.

3. Flexibility and adaptability

There is a trend towards greater flexibility and adaptability throughout logistical supply chains from which maritime logistics cannot be immune. Given market uncertainties and existing global pressures on the capacity to supply and move goods by sea, it may well be that stevedoring activities are asked to be more flexible and adaptable, and to achieve more rapid turnarounds than in the past.

This is an industry with previous experience of seismic structural shifts. Whilst loading and unloading ships is perhaps one of the world's oldest industries, it changed fundamentally with containerisation, which we understood to have imposed comparatively generic technologies and processes of work throughout the world. Change may be more complex and multifaceted in the 2020s, but the industry comes to it with positive enough experience in successfully navigating vastly different circumstances. Hopefully this review can provide both a catalyst for change, and the input of practical ideas and priorities to guide the industry, and prompt realistic dialogue on change.

We caution any who may labour under the misapprehension that the industry's performance does not matter, and that goods have to come to, or be taken from Australia by sea. Whilst the only way to land goods in Australia is practically by sea or air, as we don't have land-based alternatives, nothing compels the world's shipping lines to service Australia. Perhaps more foreseeable are impacts on price, practicality and timeliness of getting goods to and from this country, based on the costs, efficiencies and inefficiencies of our waterfront logistics.

3.2 Challenges

Closely linked to structural shifts are the challenges facing the sector.

First and foremost, maritime logistics, ports etc are tackling the same mega trends and challenges as other workplaces.

Whilst most Australians never set foot on the docks, our maritime sector workplaces are workplaces like any other, and those who work in them are part of the wider Australian community, share the aspirations and concerns of the community, and confront the same constraints, challenges and opportunities others are addressing.

Without attempting a complete list, key challenges include:

- Navigating the future of work, and changes in work and expectations of work (see below).
- Resilience and adaptability to changing circumstances. Nothing better captures this than every single workplace in the world having to change, virtually overnight in the face of pandemic.

- The constancy and increasing rapidity of change and need to adapt and strategically adjust. This is encapsulated in a growing sense that in every area of commercial endeavour there is a constant demand to do better, and to be able to do better. This is not merely a demand for constant growth and productivity, there is also active contest over what doing better means in the contemporary world.
- A growing need to meet employee expectations of being consulted on how work will be undertaken, or employers not solely offering work on a take it or leave it basis.
 - Employees increasingly want work that is multi skilled and variable enough to remain interesting, they want lifelong learning and adaptation and aspire to careers that will see them work for different employers and in different occupations and industries. To the extent that maritime work is implicitly or explicitly based on the idea or expectation of high barriers to entry then 'protected' jobs for life, that is not going to survive wider changes in work and the aspirations of working people as generations change.
 - As we write this submission, many employers are competing for employees in an unprecedentedly tight labour market and changing generations of employees are looking to derive different satisfactions and benefits from work. Maritime is not immune from this wider trend, and as work changes towards more generic technical and technology skills it will compete with other industries, that have other attractions for employees.
- The challenges of successfully securing greater diversity, which we expand on below. The rationales for diversity are wide ranging, but employers increasingly cite hard-headed commercial reasons for pursuing a more diverse workforce.

Added to such challenges is the seismic shift and reset of pandemic and recovery. In all industries and between all nations there will be a fresh jockeying for position. Those who best navigate this shaking out of markets and competition, and those who strategically improve and reposition will succeed, prosper and set a foundation to do even better in future than they did pre-pandemic. This is a global megatrend from which the Australian maritime industry cannot be immune, once COVID is conquered epidemiologically, wider repositioning and change is set to characterise or impact on every facet of working and doing business in Australia across this decade.

Further layering comes from particular challenges for particular sectors, information on which should come to the Commission from the sector itself.

3.3 The Future of Work

One of the key global megatrends impacting every industry, in every country is the changing nature of work and the basket of developments broadly encompassed as the 'future of work'. We will take the 'future of work' as shorthand without attempting to encompass the concepts involved.

The key point for this review is that the maritime industry is as challenged by the changing future of work as any other and will have its own unique future of work challenges and opportunities, which it needs to understand and actively navigate.

The success of the Australian maritime industry in engaging with and effectively navigating changes in work will be of significant and wide-ranging importance not only to the industry and all those who

work in it, but also to Australia's economy, growth and development, and attractiveness as a place to do business, invest and employ.

Australia cannot change and will never change the fundamental importance of moving goods by sea. However, how we apply people to this task is of fundamental importance to our success as a seaborne trading nation. It seems of particular importance that this industry, too often mired in industrial disputation, inefficient and unproductive collective bargaining, and in pettiness and entrenched poor work practices, be able to lift its eyes and strategically look to the future, based on strategic and practical cooperation not conflict.

Recommendation 3: Future of Maritime Work Research / Strategy

- Industry participants should be invited by the appropriate Minister to come together as a 'Ministerial Taskforce on the Future of Work in the Maritime Industry', tasked with:
 - Reviewing changes in work, current and forecast, in Australia and globally, and identifying those relevant to maritime employment in Australia.
 - Identifying key challenges, opportunities and imperatives for the maritime industry and for future employment in the industry, and how work is changing and forecast to change.
 - Researching international best practices, innovations, trends and forecasts for maritime employment.
 - Researching how the industry is changing globally (for example towards automation, changes in technology, shipping practices, the composition of fleets, shipping timetables etc) and identifying implications for the future of work in the sector in Australia.
 - Making recommendations to ensure the Australian maritime industry is effectively positioned to successfully navigate the changing future of work in the sector / across industry generally.

3.4 Labour Supply and Skills

3.4.1 Skills

Direct industry participants are best placed to assist the Commission on current and forecast skills needs, and on 'structural shifts in the nature and type of work in the maritime logistics sector'. However, ACCI's broad understanding is of an industry that:

- Has traditionally been dominated by heavy physical work, with some specialised activities learned on the job. Whilst specialist skills and competencies are developed on the job, in technical terms maritime employment is dominated by ANZSCO Classification 7 Machinery Operators and Drivers, and Classification 8 Labourers.
- Is transforming or will inevitably transform towards not only greater automation, but to different mixes of skills, which will require potentially higher levels of STEM and technical competence, and higher levels of education and training to operate robotic and similar

technologies. Employment may continue to be dominated by ANZSCO Classification 7 but with higher technical demands / different competencies for employees.

Like other traditional blue collar or heavy industries, such as parts of manufacturing and mining, skill needs are changing, and the workforce profile will need to change to meet these needs (as well as retraining and reskilling some of those already in the industry).

Consideration needs to be given to job design and effectively planning for these foreseeable changes in jobs and skills requirements. The industry should come to this exercise with the benefit of highly comparable work being undertaken in other countries, with for example the global homogeneity of containerization delivering a rich body of data and experience upon which to base skills prioritisation and planning for maritime logistics.

With the planned introduction of skills clusters which will not only be responsible for updating the vocational education and training (VET) training packages but also workforce strategic planning, there is a good opportunity for there to be a more structured approach to identifying skill needs and gaps in all industries including maritime.

There have been issues in the past with the maritime training packages where providers and participants have gravitated towards courses delivered with time frames that are too short to effectively impart the necessary skills. This will be an important workforce strategic risk that the Skills Cluster responsible for maritime will need to successfully address.

Recommendation 4: National Maritime Skills Strategy / Roadmap

In parallel with, or as part of, the strategic approach to workforce planning within the new Skills cluster framework, industry participants (employers and unions) should be convened to develop a Roadmap of Future Skills Needs, including specialist and general vocational skills, and practical tools for future job (re)design (able to be applied at the workplace or enterprise level).

3.4.2 Diversity

All Australian workplaces are confronting imperatives to be more broadly reflective of the wider community. There is substantial research on the commercial and efficiency benefits of greater diversity, and the benefits of more diverse workforces are widely accepted as a core pillar for successfully doing business in the contemporary world, and for attracting the best people.

There is a concern that maritime employment may not be as far embarked towards diversity as industry generally, not for want of employer intent or recognition but as a function of entrenched cultures and practices in maritime workplaces. The industry has a reputation as male dominated and dominated by those born in Australia or with roots in longer standing countries of origin in migrating to Australia. Until there is a basis to conclude otherwise, this should be treated as a concern and examined as a potential detractor from a number of the priorities identified in the terms of reference.

Many in the industry take pride in intergenerational employment on the docks within families, which whilst understandable, suggests an industry removed from wider trends towards diversity and business engagement with the wider community. As we observe elsewhere in this submission, most Australians will never set foot on our ports, but a culture of uniqueness and remoteness is not necessarily healthy or supportive of innovation, productivity, efficiency and growth.

Our ports cannot be like sequestered monastic enclaves, deliberately isolated from the wider community in which they operate and perpetuating arcane rules and practices that serve to exclude many members of the community that are quite capable of doing the work, delivering performances and improving workplaces.

This concern was starkly highlighted by the ‘family and friends’ clause included in the Hutchison Ports Agreements for Port Botany and the Brisbane Terminal, which is reported to require that:

Up to 70 per cent of new hires at Hutchison Ports will have to be sourced from employees’ “families and friends” and a union list of names as part of what the wharfies’ union is calling a ground-breaking deal...

“Recruitment will no longer be left to managerial prerogative, by ensuring 70 per cent of new recruits are put forward by workers and the union.”

According to an MUA document on the in-principle deal, about 40 per cent of new hires will be sourced from “families and friends of employees”, 30 per cent through names offered by the union and the remaining 30 per cent by management.

This serves to perpetuate a monoculture on our ports. A key question for the MUA in insisting on such a practice is whether its list of anointed or preferred people, who it demands be employed, contains as many women as the wider community, as many migrants, as many indigenous Australians etc?

It seems a risk that the family and friends of what is anecdotally a male concentrated and not particularly ethnically diverse workforce, are going to look rather the same. We would welcome the MUA correcting us if we are wrong in advancing this concern.

This ‘union preference clause’ whilst being objectionable in itself, should also lead the Commission to be concerned that the maritime workforce risks perpetuating unhealthy sinecures and limiting new blood and renewal. If that is correct, this will hold the industry back, and would deny many in the community access to the high paying and reliable work that the maritime industry can provide.

The two obvious points of concern are whether the industry is sufficiently accessible to women, and to new migrants. To turn this concern into practical actions, more information should be gathered with a view to potentially pursuing greater gender and race diversity:

Recommendation 5: National Maritime Industry Diversity Strategy / Priorities

The AHRC, through its Sex and Race Discrimination Commissioners should, following input from employers and unions, be jointly tasked with inquiring into, and making recommendations on, measures to support greater diversity in maritime industry workplaces, with particular reference to:

- Greater gender diversity, attracting more women into maritime work and supporting women's recruitment, retention and career development. This might include:
 - Reviewing and reporting on the experiences of women who work in this unique sector and those who have left during the preceding 5 years to discern what's being done well, and where specific barriers and disincentives to female participation may lie.
 - Reviewing good practices in the employment of women in other traditionally male dominated sectors and commending them to the maritime sector.
- Opportunities for greater diversity of race and national origin, including scope for the maritime sector to become a vanguard or leading employer of recent migrants.

It is useful to recall the active efforts of another traditionally male dominated industry to become more gender diverse and more accessible to women, through ACCI member AMMA:

Australian Women in Resources Alliance (AWRA)

In its eighth year as the industry's leading national diversity and inclusion initiative, the Australian Women in Resources Alliance (AWRA) continues to facilitate programs, support and guidance to assist employers to build their diversity and inclusion capability.

By promoting the importance of diversity and inclusion in the workplace and working with employers on real strategies and programs to lift female representation, AWRA is assisting AMMA members to become employers of choice.

AWRA delivers a range of support programs for navigating the challenges of workforce diversity and inclusion to achieve positive outcomes, while also hosting regular lunchtime information webinars with gender diversity leaders and innovators from within industry.

Recent AMMA / AWRA initiatives encompass:

- Annual employer of choice awards for women working in mining and energy.
- An active program of industry webinars and events to share good practices and employer experiences in pursuing greater gender diversity and in the employment of indigenous Australians.
- Appropriate workplace behaviours training, with a particular emphasis on combating sexual harassment.
- Inclusive Safety Audits – described as:

AMMA members have shown a rising desire for AMMA to undertake an Inclusive Safety Audit within their organisations, examining psychological safety in resources and energy operations. The aim of an inclusive safety audit is to assess the real and perceived physical and psychological safety of employees, whether they are all employees, employees from a specific work site, or employees from a minority group. Each component of the audit serves a somewhat different purpose, and when combined, they give a multidimensional view of inclusive safety. The audit's design takes into account the wide range and variability of work practises and locations in the resources and energy industries in order to accommodate a wide range of employees.

- An industry wide induction program focusing on bullying and harassment.
- Actively mentoring women to develop careers in mining, energy and resources.
- Actively encouraging STEM studies in primary schools, and the aspirations of girls to work in STEM fields and in mining and energy in particular.

There seems much to be derived from employer driven efforts in other traditionally male dominated industries to become more gender diverse.

Particular attention might usefully be paid to manifestations of cultures and attitudes that have discouraged women from participating in the industry, or that have driven women to leave the industry, and how these may be changed in future. We would expect the MUA to enthusiastically engage with and support measures to improve the accessibility and attractiveness of maritime work to women and migrants.

3.5 Industrial Relations Considerations

ACCI encourages the Commission to engage with the input of those directly working in the maritime sector, including in particular perspectives from maritime employers. However, we also encourage caution and scepticism on what may be presented as accepted, necessary or agreed arrangements in the sector.

The feedback ACCI receives is of a sector in which industrial relations are not efficient, fair, or productive, and do not support industry sustainability and adaptability. Reports are of a sector in which industrial relations is going to be tough and robust, and in which there is very strong support for active union representation, but which is not delivering a healthy, positive and productive version of those realities.

To be completely clear, it is entirely possible to have sectors of our economy which are both comparatively highly unionised, and which operate efficiently, productively, competitively, and adaptively to changing circumstances. Done well, dialogue with representative unions can be an asset. We don't understand the waterfront to be delivering to this standard, which is then misunderstood as presenting a false binary between strong unionisation and productivity.

Feedback to ACCI is of a sector that is too often unduly, unproductively and unnecessarily adversarial, and in which opposition and contestability fails to serve the interests of either employers or employees. If assumptions in the industry remain that the only worthwhile outcomes come from a fight, and unions are not doing their job without constant conflict, that needs to change.

We are also told of shopfloor industrial relations that is often petty and rule bound, and in which poorly drafted enterprise agreements are applied as strict rule books rather than as foundations for positive, problem solving, practical day-to-day relations based on mutual trust and confidence.

Protracted enterprise agreement negotiations occur too regularly (sometimes taking years), delaying wage increases for employees, denying employers certainty and foreseeability in budgeting and operations, to say nothing of the negative impacts on wider trade and commerce and on the Australian community. This seems an industry that still believes it is necessary to have a fight to get to the best possible outcome, and that gains are inherently zero sum rather than mutually sharable.

Agreement negotiations too regularly (if not inevitably) trigger industrial action and damaging threats of industrial action. Whilst there is a right to strike in Australia, and an accepted role for industrial action under the Fair Work Act, for more than a century our industrial relations system has recognised that strikes are damaging and undesirable, and that negotiations should overwhelmingly proceed without strikes or lockouts. This seems lost on the maritime sector, and it is not healthy or desirable for any industry to see negotiations degenerate into striking as regularly and commonly as seems to occur in maritime logistics.

Overall, the picture seems to be of an industrial relations culture that is not as healthy or positive as it could be, and of an unhealthy exceptionalism or immunity of the sector from the positive cultural changes that both labour and coalition governments have delivered on industrial relations across the past three decades, that benefit employers and employees in other industries on a daily basis.

We caution the Commission against exaggerating the importance and centrality of industrial relations to the performance of this sector. However, reform of industrial relations and doing better on industrial relations must play an important part in improving the performance and reliability of our maritime sector, and what it contributes to our nation.

ACCI raises the following ideas for consideration during the next phase of the inquiry:

3.5.1 Allowable agreement content

The allowable matters for agreement making, and for protected industrial action under the Fair Work Act 2009 should be more closely confined to the employment relationship between employers and employees and to terms and conditions of employment, and not to other considerations, claims or grievances. Not everything that concerns trade unions should automatically become an industrial matter regulated through collective bargaining, particularly in a system which creates a legally protected right to strike and in which collective agreements become delegated legislation enforceable by the machinery of the state.

The Fair Work Act should be amended to exclude from the permitted matters for bargaining and protected industrial action matters relating to relations between employers and unions, instead focusing solely on matters directly pertaining to the employer-employee relationship. Even further specificity may be required on what may and may not be included in enterprise agreements and claims giving rise to legally protected industrial action.

We recall positively Recommendation 20.2 of the Commission's 2015 Inquiry into Australia's Workplace Relations Framework:

RECOMMENDATION 20.2

(SECTION 20.4)

The Australian Government should amend the *Fair Work Act 2009* (Cth) to:

- remove matters pertaining to the relationship between employer and employee organisations from the list of permitted matters in enterprise agreements
- specify that an enterprise agreement may only contain terms about permitted matters.

Recommendation 6: Advance Recommendation 20.2 of the 2015 inquiry into Australia's Workplace Relations Framework.

The Commission should recall and again advance Recommendation 20.2 of its 2015 inquiry into Australia's workplace relations framework.

The Fair Work Act should additionally be amended to provide the Minister for Industrial Relations specific powers to issue regulations rendering specific claims and agreement provisions unlawful. This would have the effect of not allowing claims for such provisions to provide a trigger for legally protected industrial action, as well as rendering any such provisions as may be agreed to inoperative. This would be a fail-safe against unacceptable attempts to use collective bargaining to compromise or detract from the rights of individual employees, or to pervert the inherent roles employer and employees in contract relations. Such regulations would be disallowable instruments.

3.5.2 Agreement drafting review

ACCI understands finalising and having approved an enterprise agreement in the sector is only half the battle, and that there is an entrenched shopfloor culture of following unique rules and work practises which are not only discouraging of productivity, efficiency and positive relationships at work, but which also of themselves generate rather than avoid day-to-day disputation. This seems a very 1970s approach to industrial relations, and as outlined above to reflect a culture that has not benefited from the bipartisan industrial relations changes of the past three decades.

Enterprise bargaining has to be more than freedom from the shackles of pre-1980s centralised wage fixation, and it has to deliver more for employers and employees than wage increases. Sound enterprise bargaining needs to deliver productivity, improved workplace relations and a foundation for improving workplace cultures, in exchange for the healthy concurrence of more secure jobs, more secure enterprises and higher pay.

We further understand that unnecessarily complex and ambiguous workplace agreement drafting gives rise to contests and disputes which too often end up in the Fair Work Commission. Issues that

in other industries are generally solved through practicality and goodwill, on the waterfront give rise to litigation and disputation.

A healthy and effective union presence in workplaces, such as through shop stewards and safety officers, can be a partner in management, support positive and productive workplace relations, and keep work on track. A positive union presence can deal effectively with many grievances. However, in an unhealthy workplace relations culture, there is a risk of detracting from efficiency and productivity and the quality of working relations.

This is not helped by poor drafting or poor regulation, which is a problem throughout our industrial relations system in which collective agreements are not private settlements between employers and unions or employees but become Fair Work Instruments enforced as delegated legislation. Australia has problems enough in the quality, clarity and exactitude of our legislative and award drafting in industrial relations; they multiply exponentially when drafting of the law is affectively outsourced / delegated to employers and unions trying to settle points of contest during disputation and litigation.

Workplace cultures cannot be changed overnight, it is the role and responsibility of employers, employees and in this instance unions in workplaces to change cultures and relationships for the better. Any purported role for government or regulators has to be approached cautiously, sceptically and on an exceptional basis. Governments can however provide research, information, and promote good practices:

Recommendation 7: Benchmark Enterprise Agreements for the Maritime Sector

Research or benchmarking be undertaken comparing enterprise agreements for the maritime sector to comparable enterprise agreements in other sectors of the economy. This might encompass:

- Comparing not only the topics addressed in the enterprise agreements, but also the clarity and exactitude with which they are addressed, in maritime versus other sectors.
- Identifying any unique or bespoke agreement matters in the maritime sector, the basis for them and their impact on industrial relations productivity and efficiency.
- Reviewing disputes notified to the Commission in maritime logistics and classifying them by particular topics / agreement clauses, and in turn making some informed comparison as to whether such disputation reaches the Commission, in what numbers compared to other industries, and the extent to which agreements are diffusing or adding to disputation.
- An expert drafter reviewing or commenting on indicative sample of maritime enterprise agreements to identify particular areas of ambiguity risk and disputation, which could in turn be followed up by expert resources to support improved drafting produced by government, with input from industry and unions, and if agreed, the Fair Work

Commission.

We recognise that certain degree of informed / expert subjectivity is raised in trying to assess or compare the outcomes of collective bargaining in any sector of the economy to other sectors. This maybe the type of review that is usefully allocated to an individual expert reviewer, such as a former member of the Fair Work Commission, supported by a temporary secretariat. We recommend against a member of the Commission who regularly dealt with maritime matters either during their time on the Commission or prior to their appointment.

Alternatively, a number of major consulting firms would be well equipped to provide expert, independent analysis and comparative assessment in this area as outlined above.

3.5.3 Genuine freedom of association

All Australian employees should genuinely free to determine whether to, or whether not to, (a) join a trade union, (b) associate with a union, (c) be represented by a union in bargaining or (d) be represented by a union day-to-day at the workplace level.

The law and practice of industrial relations in Australia has to do more than pay lip service to freedom of association. Where ingrained cultures and practises deny freedom of association to individuals, more needs to be done.

Depending on one's perspective, our ports are either proud bastions of traditional, unashamedly militant and effective trade unionism, or they are an unacceptable backwater in which accepted tenants of the contemporary labour market and industrial relations system have not been effectively implemented, and this is unacceptably harming employers and employees in the sector, as well as the wider community.

Expressed another way, there are strong suggestions of a sector which has been damagingly immune to positive changes in Australian workplaces generally. Fundamental areas of bipartisan agreement about how our industrial relations system should operate and fundamental protections for employees and the decisions they have a right to make are not being respected in practice in the maritime sector.

Recommendation 8: Ban Family and Friends Union Preference Clauses

'Family and Friends' style union preference clauses, such as that agreed between Hutchison Ports and the MUA:

- Should not be able to be included in any future agreements approved under the Fair Work Act, nor to be able to be advanced as claims that can give rise to legally protected industrial action. Specifically, these should become 'objectionable terms' under the Fair

Work Act, as is presently the case for union bargaining services fees (see s.353).

- Any existing term of an in-term or expired but still operative enterprise agreement which provides for union preference, or cedes discretion in hiring to a union or union provided list (however described), should be specifically over-ridden and rendered inoperative.
- For the avoidance of doubt any such clauses in agreements should also be specifically identified as discriminatory terms, not able to be included in an agreement, nor to be advanced as claims that can give rise to legally protected industrial action.
- Were such clauses to remain allowable under our industrial relations system, federal anti-discrimination legislation should be amended to make any union that provides a list of employees to an employer from which they insist, contend or seek that employment be drawn, solely and comprehensively liable for any actionable discriminatory impact of such recruitment.

3.5.4 Specialist regulation

It may also be necessary to consider a specialist regulator to better promote productivity and to protect freedoms to associate and not associate in the industry, in practice. We look forward to reviewing and responding to submissions received in this regard, and any options the Commission may wish to canvass.

ACCI looks forward to responding further to the Commission's initial review of the input and ideas it receives, and to the Commission's questions and options for further consideration (i.e. responding to the pending Draft Report).

4 The Future of Maritime Logistics in Australia

4.1 Competition

Though Hutchison and VICT have been added to Australia's maritime shipping industry in recent years, port investment and productivity growth continue to decline. ACCC data reveals the introduction of Hutchison and VICT were accompanied by short-lived spikes in industry investment however these were not sustained, with port investment and productivity continuing in a downward trajectory.

The incentive for players in the industry to invest in productivity gains and improve their competitive position in the market is missing. Coupled with anti-competitive regulation in Part X of the Competition and Consumer Act 2010, Australia's maritime logistics system does not provide for a competitive environment.

Competition could be incentivised through both longer term and short-term initiatives.

Long term investments to promote competition between players include:

- Increasing the number of shipping lines to improve choice and drive down cost,
- Increasing the number of ports to provide better ship accessibility and reduce congestion,
- Expanding existing ports to increase the number of stevedores.

Australia doesn't have domestic shipping capabilities and the number of shipping lines servicing Australian ports continues to decline. This is contributing to shipping lines quoting extensive delays deterring services to Australia, as recently reported by the ACCC.¹

Increasing the number of ports is needed to improve accessibility and congestion at ports. However, this cannot happen unless Part X of the Competition and Consumer Act 2010 is repealed to remove barriers to competition and encourage new entrants. The land development and infrastructure investment required to develop new ports would be significant and is a lengthy process which would not address current delays. Yet, it should be considered to improve the efficiency of Australia's maritime shipping system over the longer term.

The expansion of Australia's existing ports coupled with an increase in the number of stevedores operating in Australia would also address accessibility, congestion and competition issues. In recent years Australia has increased the number of stevedores with the introduction of VICT and Hutchison, but this did not incentivise competition in all tier levels of stevedores. The top tier duopoly of DP World and Patrick did increase their investment spend with the arrival of each stevedore, but this was not maintained, and their market share was not significantly affected.

A shorter-term investment to drive competition is to incentivise automation. The addition of VICT to the Port of Melbourne was a key development to the Australian port landscape because it is the first fully automated terminal in Australia. However, since it was completed 5 years ago, it has not led to substantial investment in automation by other stevedores, nor are stevedores intending to pursue widescale automation. Stronger incentives are needed in the maritime shipping sector to

¹ ACCC 2021 *Container Stevedore Monitoring Report 2020-21*.

encourage automation and make Australia's port system a more competitive ecosystem, driving industry players to be more efficient. With competition and choice comes efficiency.

Recommendation 9: Increase Competition

Increase competition in the maritime port system to provide more choice in the sector and achieve efficiency gains.

4.2 Innovation and efficiency gains

Issues in Australia's maritime logistics system haven't changed dramatically over the years however productivity has decreased. Added investment and innovation is needed to address issues in the system and increase efficiency gains.

Improvements to innovation in the port system were made with the introduction of VICT at the Port of Melbourne. While the addition of an automated stevedore has not incentivised widescale automation, it has supported efficiency gains. A survey by the Bureau of Infrastructure, Transport and Regional Economics shows a decrease in truck turnaround times in Melbourne of 22.3% following the introduction of VICT compared to Adelaide and Sydney's increases of 10.6% and 8.3% respectively. Container turnaround times also decreased in Melbourne by 23.6%.

Automation is a disruptor and can make stakeholders wary. Though there have been efforts to better digitalise and automate the maritime shipping sector, low adoption has been attributed to an imbalance between perceived productivity gain and perceived workforce impact.

For automation to be effective at delivering substantial productivity gains, flexible labour arrangements should be facilitated, and the costs and benefits of port automation projects should be better identified. This includes the impacts to employment, the economy, tax revenues and social costs. We need informed debate between all stakeholders to improve communications and advance wider adoption of automation.

Further, Australian ports should be benchmarked against best practice ports in other countries to support a better system. Our port system is largely modelled on the United States however US ports are lagging behind in efficiency and automation. Some US states have even moved to legislate restrictions on port automation projects and purchases. Australian ports should aspire to port systems that offer more advanced and innovative services, such as Shanghai, Singapore, Rotterdam, Hamburg, and Antwerp.

Shanghai is the world's busiest and largest container port with the Yangshan Deep Water Port the world's largest automated container terminal. Singapore is the top maritime capital with the Tuas Megaport expected to become the largest fully automated port in the world upon completion in 2040. Rotterdam, Hamburg, and Antwerp ports are all leading the global stage in smart port technology and digitalisation. Australia should be benchmarking itself against leading ports like these rather than the US port system.

Australia needs forward planning, stronger global benchmarking, transparent information, and widespread commitment to realise the full benefits of automation in the maritime logistics system.

Effort should also be taken to improve the digitisation of supply chains. E-certificates for ships and seafarers are gradually gaining acceptance with the COVID-19 pandemic championing mass digitalisation and the creation of standards for electronic trade documentation such as certificates of origin, bills of lading, letters of credit, invoices etc. Advancements are also being made in single window and port community systems to track and secure supply chains while facilitating productivity gains, but Australia's developments in these areas are lagging behind other countries.

All ports have room for efficiency gains through digitalisation and data-sharing. The Simplified Trade System is expected to simplify the trade process and bring innovation through data sharing to Australia's trade landscape, but full engagement from all players in maritime shipping is needed to achieve substantial gains in efficiency and productivity.

Current congestion in the port system is difficult for business to endure but it may be a catalyst for further and faster digitalisation of Australia's maritime shipping.

Recommendation 10: Pursue Innovation and Best Practice

Pursue an innovative maritime logistics system with forward planning, transparency, and goal-driven global benchmarking. Make the most of current issues to advance supply chain digitalisation and simplify trade.

4.3 Benchmarking

All Australians have an interest in the performance of our maritime sector. As a seabound nation we are more reliant on our ports and their effectiveness than most, and the productivity and efficiency of our maritime sector is vastly far-reaching importance and impact to all businesses and jobs in Australia. There is no part of Australian industry and commerce that is not ultimately reliant on the effective movement of goods in and out of the country by sea.

Productivity and efficiency on our waterfront must be an open and publicised, accessible and scrutinised source of data and information, essential to policy and macroeconomic performance. Australians need to know how our ports are performing and need to have the information necessary to ensure the industry is playing the instrumental role in our lives that we need it to play. Like regular blood tests to a doctor, we need regular diagnostic information to make sure our waterfront continues to perform the functions we need it to perform.

The sector itself, government, unions, investors and analysts need high quality performance metrics and benchmarking information, both to allow the Australian industry and specific operators to know how they're performing against domestic norms, and to know how we are stacking up internationally.

A healthy market and healthy public policy relies on information, as do imports and exports. In this regard we make the following recommendation:

Recommendation 11: Review Benchmarking and Data

There should be a regular flow of information / publication on the performance and productivity of the Australian maritime sector, and in particular the performance of our ports:

- Information should be made available to the industry, port users and the public on the productivity performance Australia's maritime logistics sector, in a form that allows both historic benchmarking and benchmarking against the performance of ports in other countries.
- To ensure the information provided is relevant and as useful as possible:
 - Users should be asked what information they require on port performance, how they would like to be able to query, correlate and review such information, and how they may wish to integrate it with other information sources, modelling and analysis.
 - There should be a comprehensive review of comparable benchmarking information globally, to ensure:
 - Australian performance can be effectively and rapidly compared to ports in other countries (i.e. data integration and comparison).
 - Our information flow reflects international best practice and is world leading.
- Whether through the Department of Transport, Industry, the ABS or otherwise government should fund the gathering and maintenance of effective real time and over-time information on the productivity and performance of our waterfront sector (and fund any one-off re-calibration of historic data to new standards). Waterfront performance data should be specifically funded (dedicated and guaranteed) and not be subject to competing prioritisation within the ABS for example.

4.4 Infrastructure

Compared to New Zealand, Europe, East Asia and North America, Australian investment in port infrastructure is behind the curve. New Zealand has built a secondary port with forward planning and land holdings for expansion and servicing of larger ships. Most Australian ports do not have these land holdings or expansion opportunities. The Port of Newcastle Multi-purpose Deepwater Terminal concept would accommodate larger shipping vessels in Australia and have land available for future development activities should it be commercialised. However, there is no current infrastructure to service larger ships which provide cost saving benefits.

To service larger ships, large investments would need to be made, including:

- Creating and maintaining necessary channel depth

- Developing wharf infrastructure to accommodate larger volumes including larger and heavier equipment
- Integrating rail and heavy vehicle road networks with longer rail sidings, intermodal facilities, and accommodations for trains longer than 1.2km.

Rail connectivity is an infrastructure investment which is needed to service larger ships, as well as meeting current container freight demands and bringing more goods into the Australian market at a faster pace. This is especially important to reduce current congestion at ports.

Though investment is being made to connect Australian ports through the Inland Rail project, further investment is needed to improve the serviceability of ports by train. The more efficient port-trains are between 1200-1800 metres, yet Port Botany's capacity is 680 metres; Port Melbourne is 640 metres, and Port of Brisbane is not yet connected to a designated rail freight system.

The NSW Freight and Ports Plan 2018-2023 predicts the level of container freight handled by Port Botany will increase by 77%. Investments in NSW rail services are being made to accommodate this increase however the level of investment may not be enough. Port of Melbourne are making similar rail investments, which may also fall short of the global standards, with modifications to the Swanson precinct common user sidings aiming to accommodate 600-metre-long trains as opposed to the global best standard of 1200-1800 metres.

One freight train is the equivalent of 54 trucks, yet trucks are relied on to shift the majority of containers to and from ports. In the past 10 years only 10% -12% of Australia's containers were transported by rail to container ports. Investments in rail infrastructure at and in-between these ports are a needed development, but it must be able to accommodate high demand and reduce congestion – especially if Australian ports move to service larger ships.

Recommendation 12: Invest in Infrastructure for the Future of Maritime Logistics

Invest in infrastructure for the future of maritime logistics. Support the development of deepwater terminal services and investment to expand and grow port-rail capabilities. Invest in port and transport infrastructure that support future needs, including deepwater terminal services and investment to expand and grow port-rail capabilities.

4.5 Regulation

Regulation of the maritime logistics industry requires strategic diligence. Australia does not have domestic shipping capabilities and therefore depends on overseas shipping lines to service Australia. Over-regulation which makes Australia an unattractive market may severely damage our attractiveness and remove trade routes from our market. Equally, under-regulation can create an inefficient and unfair trading system.

Rather than creating an entity to regulate the maritime shipping industry, regulatory oversight should be allocated to the Australian Competition and Consumer Commission (ACCC). The ACCC is established with State and Territory Governments, private sector port operators, and onshore

stakeholders; and is already responsible for monitoring the performance of container stevedoring and investigating complaints of international liner cargo shipping conference agreements. For the ACCC to be an effective regulator of the port system it will need a permanent foothold as opposed to current fluidity moving in and out of the industry.

The ACCC should be given an expanded scope which includes developing and instituting a long-term port strategy, addressing anti-competitive regulation and behaviour, publishing economic-based modelling, providing details and statistics of port operations, and providing details of the last mile/ kilometre.

The ACCC should also undertake recommended actions from its *Container Stevedoring Monitoring Report 2020-21*:

- Address industrial relations and restrictive work practices issues across the supply chain
- Ensure that privatised ports do not levy excessive rents and charges
- Repeal Part X of the Competition and Consumer Act 2010
- Invest in infrastructure to fix inefficiencies in the supply chain caused by larger ships, lack of rail access to Australian container ports and shortage of space in empty container parks.

In addition to Federal regulatory oversight through the ACCC, State Governments should be given remit to publish data and outcomes on ports. This is especially applicable to port lease agreements to achieve transparency and optimise competition.

With continuing uncertainties, disruptions, and high costs it will be increasingly important to monitor changes in the industry and ensure transparent practices when setting fees and surcharges. The flow through to consumer prices will also need to be regularly maintained. Regulatory oversight at a Federal and State level will create a more transparent and efficient maritime shipping system.

Recommendation 13: Create a Fair and Conducive Regulatory Environment

Regulate maritime logistics through the ACCC to create a fair and competitive system which promotes Australia as an attractive shipping market. Implement recommendations from the ACCC *Container Stevedoring Monitoring Report 2021-21*.

5 Conclusion

The performance of Australia's maritime logistics industry has been poor long before the COVID-19 pandemic and related supply chain disruptions. Balancing technological advancements and economic growth with industrial relations has and will continue to be a significant challenge. The regulatory landscape is also inadequately balanced, actively prohibiting competition.

However, steps can be taken, and investments made to improve the productivity of Australian maritime shipping and create an open and competitive sea shipping system. With focus on improving innovation, championing automation, digitising trade, servicing larger ships, better connecting ports with rail services, and creating a fit for purpose industrial relations environment, Australia can have a productive maritime logistics system with the right balance of regulatory oversight and market competition. But we need committed action to create this system, not just another report.

The Australian Chamber of Commerce and Industry is excited to assist the Productivity Commission in their inquiry into Australia's maritime logistics system. ACCI looks forward to working with Government and industry on creating a fair and competitive shipping industry.

6 About the Australian Chamber

The Australian Chamber represents hundreds of thousands of businesses in every state and territory and across all industries. Ranging from small and medium enterprises to the largest companies, our network employs millions of people.

The Australian Chamber strives to make Australia the best place in the world to do business – so that Australians have the jobs, living standards and opportunities to which they aspire.

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 Australian business in international forums.

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